

LIC-14-0101 August 25, 2014

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555-0001

> Fort Calhoun Station, Unit No. 1 Renewed Facility Operating License No. DPR-40 <u>NRC Docket No. 50-285</u>

Subject: Omaha Public Power District's Third Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

References: See Page 3

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) to all power reactor licensees and holders of construction permits in active or deferred status. The Order was effective immediately and requires the Omaha Public Power District (OPPD) to install reliable spent fuel pool (SFP) level instrumentation at Fort Calhoun Station (FCS), Unit No. 1. Specific requirements are described in Attachment 2 of the Order.

Pursuant to Section IV, Condition C.2 of the Order, licensees are to provide a status report at six-month intervals following submittal of the Overall Integrated Plan, which OPPD submitted on February 28, 2013 (Reference 2). In August 2013, and February 2014, OPPD provided the first and second six-month status reports (References 5 and 6) describing progress made in implementing the requirements of the Order; this letter provides the third six-month status report. The report provides an update of milestone accomplishments including any changes to the compliance method, schedule, or need for relief and the basis, if any. The Overall Integrated Plan and subsequent six-month status reports were prepared utilizing NEI guidance (Reference 3), as endorsed with exceptions and clarifications by the NRC in Reference 4. This third report provides an update on changes in schedule related to design and installation.

This letter contains no new regulatory commitments. If you should have any questions regarding this report, please contact Bill Hansher at 402-533-6894.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on August 25, 2014.

Respectfully,

Louis P. Cortopassi Site Vice President and CNO

Enclosure: Third Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

References

- 1. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ML12056A044) (NRC-12-0023)
- Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Fort Calhoun Station Spent Fuel Pool Instrumentation Overall Integrated Plan," dated February 28, 2013, (ML13059A268) (LIC-13-0011)
- 3. Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012 (ML12240A307)
- 4. NRC Interim Staff Guidance, JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012 (ML12221A339)
- Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Omaha Public Power District's First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated August 28, 2013 (ML13241A411) (LIC-13-0124)
- Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Omaha Public Power District's Second Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 24, 2014 (ML14055A397) (LIC-14-0023)

Fort Calhoun Station, Unit No. 1

Third Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

1 Introduction

The Omaha Public Power District (OPPD) has developed an Overall Integrated Plan (Reference 2) for Fort Calhoun Station documenting the requirements to install reliable Spent Fuel Pool Level Instrumentation (SFPLI), in response to Reference 1. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestones have been completed since the development of the Overall Integrated Plan, and are current as of August 8, 2014.

- Procured the Spent Fuel Pool Instrumentation in July 2013.
- Completed Conceptual Design Package in December 2013.

3 Milestone Schedule Status

This section provides the activity status of each item, and the expected completion date noting any change. The Attachment contains an update to the Milestone Schedule to support the Overall Integrated Plan. The dates are planning dates subject to change as design and implementation details are developed.

The Attachment is formatted to align with the table provided in the Nuclear Energy Institute's (NEI) Six-Month Status Report Template and supersedes the previous Milestone Schedule updates provided in References 3 and 4.

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

OPPD expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

There are no open items to report at this point in time regarding the Overall Integrated Plan or the Draft Safety Evaluation.

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7 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

- NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ML12056A044) (NRC-12-0023)
- Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Fort Calhoun Station Spent Fuel Pool Instrumentation Overall Integrated Plan," dated February 28, 2013, (ML13059A268) (LIC-13-0011)
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Attachment: SFPLI Overall Integrated Implementation Plan Milestone Schedule, Revision 3

Fort Calhoun Station EA-12-051 SFPLI Overall Integrated Implementation Plan

Milestone Schedule Revision 3

The following milestone schedule is provided. The dates are planning dates subject to change as design and implementation details are developed. Any changes to the following target dates will be reflected in subsequent 6-month status reports.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60-Day Status Report	October 27, 2012	Complete	N/A
Submit Overall Integrated Plan	February 28, 2013	Complete	N/A
Submit Six-Month Updates:			
Update 1	August 28, 2013	Complete	N/A
Update 2	February 28, 2014	Complete	N/A
Update 3	August 28, 2014	Complete	N/A
Update 4	February 28, 2015	Not Started	N/A
Modifications:			
Conceptual Design	4Q2013	Complete	N/A
Begin Detailed Design Engineering	2Q2014	Not Started	4Q2014
NRC Audit Mohr SFPLI System	2Q2014	Complete	N/A
Procure SFPLI Equipment	3Q2013	Complete	N/A
Complete and Issue SFPLI Modification Package	2Q2015	Not Started	N/A
Receipt of Spent Fuel Pool (SFP) Instruments	1Q2015	Not Started	4Q2015

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Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Begin Installation, includes Complete Functional Test of SFP Instruments	1Q2016	Not Started	2Q2016
Complete SFPLI Installation and Put Into Service, includes SFP Instrument Operational And Training complete	2Q2016	Not Started	N/A