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Omaha, NE 68102-2247

LIC-15-0024
February 27, 2015

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
NRC Docket No. 50-285

Subject: Omaha Public Power District's Fourth 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 2 of Enclosure

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 required 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, February 2014, and August 2014, OPPD provided the first, second and third six-month status reports (References 5, 6 and 7) describing progress made in implementing the requirements of the Order; this letter provides the fourth 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 fourth 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 Mr. Bill Hansher at 402-533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
February 27, 2015.

Respectfully,

A handwritten signature in black ink, appearing to read 'Edwin D. Dean', with a stylized flourish at the end.

Edwin D. Dean
Plant Manager

EDD/JKG/mie

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

- c: B. W. Sheron, Director of Office of Nuclear Reactor Regulation
- M. L. Dapas, NRC Regional Administrator, Region IV
- C. F. Lyon, NRC Senior Project Manager
- M. A. Brown, NRC Project Manager
- S. M. Schneider, NRC Senior Resident Inspector

Fort Calhoun Station, Unit No. 1

Fourth 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 January 27, 2015.

- Procured the Spent Fuel Pool Instrumentation in July 2013.
- Completed Conceptual Design Package in December 2013.
- Began Final Design Package in November 2014

3 Milestone Schedule Status

This section provides the activity status of each item, and the expected completion date noting any change. The Attachment to this enclosure 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 initial Milestone Schedule provided in Reference 2 and interim Milestone Schedules provided in References 5, 6, and 7.

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.

7 References

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

8 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)
2. 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)
5. 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)
6. 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)
7. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "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," dated August 25, 2014 (ML14237A574) (LIC-14-0101)

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

**Milestone Schedule
 Revision 4**

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	Complete	N/A
Update 5	August 28, 2015	Not Started	N/A
Modifications:			
Conceptual Design	4Q2013	Complete	N/A
Begin Detailed Design Engineering	4Q2014	Complete	N/A
NRC Audit Mohr SFPLI System	2Q2014	Complete	N/A
Procure SFPLI Equipment	3Q2013	Complete	N/A
Complete and Issue SFPLI Modification Package	2Q2015	Started	3Q2015
Receipt of Spent Fuel Pool (SFP) Instruments	4Q2015	Not Started	N/A
Begin Installation, includes Complete Functional Test of SFP Instruments	2Q2016	Not Started	N/A

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