

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

August 31, 2007

R. T. Ridenoure
Vice President
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
P.O. Box 550
Fort Calhoun, NE 68023-0550

SUBJECT: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN - FORT

CALHOUN STATION

Dear Mr. Ridenoure:

On August 8, 2007, the NRC staff completed its performance review of Fort Calhoun Station for the first half of the calendar year 2007 assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results over the previous 12 months. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official Use Only--Security Information" will include the security cornerstone review and resultant inspection plan.

Plant performance for the most recent quarter at Fort Calhoun Station was within the Degraded Cornerstone column of the NRC's Action Matrix based on one White finding and one White PI associated with the Mitigating Systems Cornerstone. The White finding involved the improper installation of the valve disk of Containment Spray Header Isolation Valve HCV-345 (NRC EA-07-047; ADAMS ML071500074). The Safety System Functional Failure PI crossed the Green to White threshold during the second quarter of 2007 because of seven reported failures. Our updated assessment was communicated to you in our Assessment Follow-up Letter, dated June 27, 2007 (ADAMS ML071780621).

When we are notified by your staff of your readiness for the NRC to conduct a supplemental inspection to review the actions taken to address the White finding and White PI, we plan to implement supplemental Inspection Procedure (IP) 95002 "Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area." This inspection will be performed to provide assurance that the root and contributing causes for the individual and collective risk significant performance issues are understood, to independently assess the extent of condition and the extent of cause, to independently determine whether safety culture components caused or significantly contributed to the individual or collective risk significant performance issues, and to provide assurance that the corrective actions are sufficient to address the root and contributing causes, as well as to prevent recurrence.

In our annual assessment letter, dated March 2, 2007 (ADAMS ML070610601), the NRC staff identified a substantive cross-cutting issue in the area of Human Performance at Fort Calhoun Station. Specifically, we identified a cross-cutting theme in the Work Practices Component involving instances of ineffective use of human error prevention techniques. Your staff conducted a root cause determination and formed a cross-disciplinary team that identified recommendations for improvements in this area. Additionally, during this assessment period, we identified another theme with five findings with cross-cutting aspects in the Resources Component of the Human Performance area, involving instances of failing to provide adequate procedures or work instructions. Examples of these included: the failure to have adequate procedures to implement post fire safe shutdown actions; inadequate procedure for plant shutdown to prevent a loss of shutdown cooling; and the failure to provide instructions for air filtration units required under a radiation work permit. We understand that this additional component/theme was added to your plan for corrective actions for the Human Performance area. However, many of your actions are not yet implemented, and overall, your actions have not yet proven effective in substantially mitigating the cross-cutting themes. Therefore, the substantive cross-cutting issue in Human Performance will remain open until we determine, through the implementation of focused baseline inspections, that corrective actions implemented in accordance with your improvement initiatives have addressed these issues.

The enclosed inspection plan details the inspections, except those related to security, scheduled through December 31, 2008. This schedule also includes the performance of Temporary Instruction (TI) 2515/166, "Pressurized Water Reactor Containment Sump Blockage (NRC Generic Letter 2004-02)." The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 9 months of the inspection plan are tentative and may be revised at the end-of-cycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

The NRC is currently evaluating the scope and frequency of all the baseline inspection procedures. If the results of the evaluation, or any other circumstances, cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Jeff Clark at 817-860-8147 with any questions you may have regarding this letter or the inspection plan.

Sincerely.

Bruce S. Mallett Regional Administrator

Docket No. 50-285 License No. DPR-40

Enclosure: Fort Calhoun Station Inspection/ Activity Plan

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Fort Calhoun

Inspection / Activity Plan 09/01/2007 - 12/31/2008

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	EB2-52B	- PIR TEAM INSPECTION	C TI		
_	IP 71152B	Identification and Resolution of Problems		09/10/2007	09/14/2007
	EP1	- EMERG PREP EXERCISE	ω		
_	IP 7111401	Exercise Evaluation		10/15/2007	10/19/2007
	IP 7111404	Emergency Action Level and Emergency Plan Changes		10/15/2007	10/19/2007
_	IP 71151	Performance Indicator Verification		10/15/2007	10/19/2007
	RP-ORS5	- OCCUPATIONAL RADIATION SAFETY-ACCESS	_		
-	IP 7112101	Access Control to Radiologically Significant Areas		11/26/2007	11/30/2007
	IP 7112102	ALARA Planning and Controls		11/26/2007	11/30/2007
<u> </u>	IP 71151	Performance Indicator Verification		11/26/2007	11/30/2007
	EB2-12T	- MAINTENANCE RULE TRIENNIAL	_		
_	IP 7111112B	Maintenance Effectiveness		12/03/2007	12/07/2007
	EB2-07B	- BIENNIAL HEAT SINK INSPECTION	_		
-	IP 7111107B	Heat Sink Performance		01/28/2008	02/01/2008
	EB1-2/17	- 50.59 & PERMANENT PLANT MODS	ω		
	IP 7111102	Evaluation of Changes, Tests, or Experiments		03/17/2008	03/21/2008
-	IP 7111117B	Permanent Plant Modifications		03/17/2008	03/21/2008
	RP-ORS1	- OCCUPATIONAL RADIATION SAFETY-ACCESS	حـ		
-1	IP 7112101	Access Control to Radiologically Significant Areas		04/21/2008	04/25/2008
_	IP 7112102	ALARA Planning and Controls		04/21/2008	04/25/2008
_	IP 71151-OR01	01 Occupational Exposure Control Effectiveness		04/21/2008	04/25/2008
_	IP 71151-PR01	01 RETS/ODCM Radiological Effluent		04/21/2008	04/25/2008
	EB1-08	- INSERVICE INSPECTION & TI 166	_		
-1	IP 2515/166	Pressurized Water Reactor Containment Sump Blockage [NRC GENERIC LETTER 2004-0]		04/28/2008	05/02/2008
-	IP 7111108P	Inservice Inspection Activities - PWR		04/28/2008	05/02/2008
_	IP 7111108P	Inservice Inspection Activities - PWR		05/12/2008	05/16/2008
	RP TEAM	- RADIATION SAFETY TEAM INSPECTION	51		
_	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		06/02/2008	06/06/2008
	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		06/02/2008	06/06/2008
_	IP 7112202	Radioactive Material Processing and Transportation		06/02/2008	06/06/2008
	IP 7112203	Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control F		06/02/2008	06/06/2008
	EB2-05T	- TRIENNIAL FIRE PROTECTION	4		
	IP 7111105T	Fire Protection [Triennial]		07/14/2008	07/18/2008
· <u>~</u>	IP 7111105T	Fire Protection [Triennial]		07/28/2008	08/01/2008

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Fort Calhoun Inspection / Activity Plan 09/01/2007 - 12/31/2008

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IP 7111111B	REQUAL - BIEN	IP 71151-EP03	IP 71151-EP02	IP 71151-EP01	IP 7111405	IP 7111404	IP 7111403	IP 7111402	EP2 - EP P	IP 71151-PR01	IP 71151-OR01	IP 7112102	IP 7112101	RP-ORS2 - OCC	IP 7111105T	EB2-05T - TRIE	Inspection Activity	
Licensed Operator Requalification Program	- BIENNIAL REQUAL	Alert & Notification System	ERO Drill Participation	Drill/Exercise Performance	Correction of Emergency Preparedness Weaknesses and Deficiencies	Emergency Action Level and Emergency Plan Changes	Emergency Response Organization Augmentation Testing	Alert and Notification System Testing	- EP PROGRAM	RETS/ODCM Radiological Effluent	Occupational Exposure Control Effectiveness	ALARA Planning and Controls	Access Control to Radiologically Significant Areas	- OCCUPATIONAL RADIATON SAFETY-ALARA	Fire Protection [Triennial]	- TRIENNIAL FIRE PROTECTION	Title	
									_							4	on Site	No. of Staff
12/15/2008		11/17/2008	11/17/2008	11/17/2008	11/17/2008	11/17/2008	11/17/2008	11/17/2008		08/18/2008	08/18/2008	08/18/2008	08/18/2008		08/11/2008		Start	Planne
12/19/2008		11/21/2008	11/21/2008	11/21/2008	11/21/2008	11/21/2008	11/21/2008	11/21/2008		08/22/2008	08/22/2008	08/22/2008	08/22/2008		08/15/2008		End	Planned Dates
Baseline Inspections		11/17/2008 11/21/2008 Baseline Inspections	Baseline Inspections	Baseline Inspections	Baseline Inspections	Baseline Inspections	Baseline Inspections	Baseline Inspections		Baseline Inspections	Baseline Inspections	Baseline Inspections	Baseline Inspections		08/11/2008 08/15/2008 Baseline Inspections		Туре	Inspection