

December 10, 2014

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

Duane Arnold Energy Center
Docket No. 50-331
Renewed Facility Operating License No. DPR-49

NextEra Energy Duane Arnold, LLC's Six-Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

- References:
1. Order EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013 (ML13130A067)
 2. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated November 14, 2013 (ML13304B836)
 3. NRC Endorsement of Industry "Hardened Containment Venting (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0," (ML14128A219)
 4. NEI 13-02, "Industry Guidance for Compliance with Order EA-13-109, Revision 0," dated November 2013
 5. NextEra Energy Duane Arnold LLC's Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109, dated June 25, 2014 (ML14182A423))

On June 6, 2013, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to NextEra Energy Duane Arnold, LLC. Reference 1 was immediately effective and directs NextEra Energy Duane Arnold, LLC (hereafter NextEra Energy Duane Arnold) to install a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris. Specific requirements are outlined in Attachment 2 of Reference 1.

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Reference 1 required submission of a phase 1 overall integrated plan pursuant to Section IV, Condition D. Reference 2 endorses industry guidance document NEI 13-02, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 2. Reference 5 provided the NextEra Energy Duane Arnold LLC overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 2 (and 4) provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition D, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Ken Putnam at 319-851-7238.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on December 10, 2014.



T. A. Vehec
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Director, Office of Nuclear Reactor Regulation
USNRC Regional Administrator Region III
USNRC Project Manager, Duane Arnold Energy Center
USNRC Resident Inspector, Duane Arnold Energy Center

Enclosure to NG-14-0285

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3 pages follow

Introduction

NextEra Duane Arnold Energy Center, LLC developed an Overall Integrated Plan (Reference 1 on page 3), documenting the planned installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Phase 1 Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

Milestone Accomplishments

The following milestone(s) have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of November 30, 2014

- Initial Outage for Phase 1 Planning
- Submit Six Month Status Report

Milestone Schedule Status

The following provides an update to Part 5 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. There are no changes to the current target dates in the Overall Integrated Plan at this time.

Milestone	Target Completion Date	Activity Status	Comments {Include date changes in this column}
Phase 1 HCVS Milestone Table			
Issue preliminary/conceptual design report	Jun 2014	Complete	
Submit Overall Integrated Implementation Plan	Jun 2014	Complete	
Initial Outage for Phase 1 Planning	Nov 2014	Complete	
Submit 6 Month Status Report	Dec 2014	Complete	
Submit 6 Month Status Report	Jun 2015	Not Started	
Submit 6 Month Status Report	Dec 2015	Not Started	
Design Complete Phase 1	Mar 2016	Started	
Submit 6 Month Status Report	Jun 2016	Not Started	
Operations Procedure Changes Developed Phase 1	Oct 2016	Not Started	
Site Specific Maintenance and Testing Procedures Developed Phase 1	Oct 2016	Not Started	
Training Complete Phase 1	Oct 2016	Not Started	

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Milestone	Target Completion Date	Activity Status	Comments {Include date changes in this column}
Phase 1 HCVS Milestone Table			
Implementation Outage Phase 1	End of RFO25	Not Started	
Procedure Changes Active Phase 1	End of RFO25	Not Started	
Walk Through Demonstration/Functional Test Phase 1	End of RFO25	Not Started	
Submit Completion Report	60 days after RFO25	Not Started	

Changes to Compliance Method

There are no changes to the compliance method as documented in the Phase 1 Overall Integrated Plan (Reference 1).

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

NextEra Duane Arnold Energy Center, LLC expects to comply with the order implementation date and no relief/relaxation is required at this time.

Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary of the open items documented in the Phase 1 Overall Integrated Plan or the Interim Staff Evaluation (ISE) and the status of each item.

Overall Integrated Plan Phase 1 Open Item	Status
Confirm secondary containment bypass leakage is acceptable without an installed rupture disk or retain an appropriated disk	Started
Perform severe accident evaluation for FLEX DG and replacement gas to confirm accessibility for use for post 24 hour actions	Started
Evaluate tornado/missile effects on HCVS components above the protected area of the Reactor Building	Not Started
Evaluate the system design for H2/CO measures to be taken	Started

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Interim Staff Evaluation Open Item	Status
None	Interim Staff Evaluation has not been issued as of this update.

Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

References

The following references support the updates to the Phase 1 Overall Integrated Plan described in this Enclosure.

1. NextEra Duane Arnold Energy Center, LLC's Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated June 25, 2014 (ML14182A423).
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3. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, Revision 0," dated November 2013.
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