NMC
Committed to Nuclear Excellence

Duane Arnold Energy Center
3313 DAEC Road
Palo, IA 52324-9646

Operated by Nuclear Management Company, LLC

December 22, 2000
NG-00-2082

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station 0-P1-17
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Supplemental Information for Technical Specification Change Request (TSCR-038):
"Revised Pressure Temperature Curves"

Reference NG-00-1717, Letter dated October 16, 2000, from G. Van Middlesworth to NRC, TSCR-038 "Revised Pressure Temperature Curves"

File: A-117

By the referenced letter, the Nuclear Management Company, LLC (NMC) requested a revision to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed change, TSCR-038, revises the vessel pressure and temperature (P/T) limit curves. On December 14, 2000, a teleconference was held between the NRC, NMC and General Electric to discuss TSCR-038.

The methodology used to determine fluence was discussed during the teleconference. This methodology is the subject of GE Licensing Topical Report (LTR) NEDC-32983P, "General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluations." This LTR is currently being reviewed by the Staff, and may not receive approval prior to March 31, 2001 (TSCR-038's requested approval date). For this reason, NMC requests interim approval of TSCR-038 until September 01, 2003. Similar interim approval was granted to Dresden, Units 2 and 3, on September 19, 2000.

As discussed in the teleconference, the proposed curves will provide ample conservatism during this restricted duration pending NRC approval of the GE LTR. Exposure will not exceed 21 effective full power years (EFPY) at that time, which provides a margin of at least four EFPY to the least restrictive curve.

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NMC is notifying the State of Iowa of this interim request by transmitting a copy of this letter to our appointed state official.

Should you have any questions regarding this matter, please contact this office.

Sincerely,

Gary Van Middlesworth
DAEC Site General Manager

cc: C. Rushworth
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