



March 18, 2002

10 CFR 50.4

Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
One White Flint North
Room 5 D2, Mail Stop 0-5 E7
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Collins:

**DOCKET 50-331
20-DAY RESPONSE TO ORDER FOR INTERIM
SAFEGUARDS SECURITY COMPENSATORY MEASURES FOR
DUANE ARNOLD ENERGY CENTER**

On February 25, 2002, the U. S. Nuclear Regulatory Commission issued an Order that modifies the current operating license for Duane Arnold Energy Center (DAEC) to require compliance with the specified interim safeguards and security compensatory measures.

The Order requires the following actions to be taken by the Nuclear Management Company, LLC (NMC) at DAEC within 20 days of issuance of the Order:

1. Item B.1 – Notify the Commission if (1) we are unable to comply with any of the requirements described in Attachment 2 of the Order, (2) if compliance is unnecessary in DAEC specific circumstances, or (3) if implementation of any of the requirements would cause DAEC to be in violation of the provisions of any Commission regulation or the facility license.
2. Item B.2 – Notify the Commission if implementation of any of the requirements described in Attachment 2 to the Order would adversely impact safe operation of the facility, provide the basis for this determination, and provide a proposal for achieving the same objectives specified in the Attachment 2 requirement in question, or a schedule for modifying the facility to address the adverse safety condition. If neither approach is appropriate, NMC must supplement its response to Condition B1 of the Order to identify the condition as a requirement with which it cannot comply.
3. Item C.1 – Submit to the Commission a schedule for achieving compliance with each requirement described in Attachment 2.

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SAFEGUARDS INFORMATION

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The NMC 20-day response to the Commission for DAEC is enclosed. The enclosure to this letter contains SAFEGUARDS INFORMATION, and as such, is exempt from public disclosure in accordance with 10 CFR 2.790 and 10 CFR 73.21. Upon separation from its enclosure, this letter does not contain safeguards information.

NMC endorses the NRC's initiatives as detailed in the Order. NMC is continuing to evaluate its response contained in the enclosure and to work with NRC staff and industry groups in addressing the requirements of the Order. NMC will keep the NRC staff informed of its plans and activity under this Order and may supplement this response, if required.

Additional questions or clarifications required associated with this submittal should be directed to Dr. M. P. Findlay, Director – Security, NMC at 715/377-3310.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on March 18, 2002.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael B. Sellman for".

Michael B. Sellman
President and Chief Executive Officer
Nuclear Management Company, LLC

Enclosure

SAFEGUARDS INFORMATION