MAR 1 1 1970

Docket No. 50-331

Mr. Duane Arnold, President
Iowa Electric Light and Power
Company
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52406

Dear Mr. Arnold:

This is in reply to your request dated November 25, 1969, for an exemption from the provisions of Section 50.10(b), 10 CFR Part 50 of the Commission's rules, pursuant to Section 50.12 of the rules to permit the performance of certain work at the site of the Duane Arnold Energy Center prior to the issuance of a construction permit by the Commission.

You stated that the requested work is needed to permit construction of the plant to proceed on a schedule that would make the plant available for commercial operation in December of 1973. You maintain that delays at this time will significantly affect the ability of your system to meet the public need for power generation. The requested work, listed in the attachment to the letter dated November 25, 1969, consists of (1) pouring of concrete for the foundation mats of the reactor building including the High Pressure Coolant Injection System structure and Pump House No. 1; (2) construction of the pedestal for erection of the reactor building drywell; (3) erection of the substructure walls, including the waterproof membrane of the reactor building, High Pressure Coolant Injection System structure and pump House No. 1 up to elevation 757 feet 6 inches.

We have reviewed your request for an exemption under the provisions of Section 50.12 and the reasons set forth in the support thereof, and have concluded that the granting of the proposed exemption is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest.

However, an exemption can be granted only for installation of portions of the structure that are below finished grade level. Accordingly, the Commission hereby authorizes you to construct the portions of the three items of the reactor facilities heretofore mentioned and described and requested in the attachment to your letter of November 25, 1969, up to a level which is below the finished grade elevation of 757 feet, prior to the issuance of a construction permit.

I wish to emphasize that the granting of this exemption shall have no bearing upon the subsequent granting or denial of the construction permit for the proposed Duane Arnold Energy Center, and any work performed pursuant to this exemption shall be performed entirely at the risk of the applicants. Furthermore, the granting of this exemption does not constitute an approval of the type or adequacy of the method of its installation.

Sincerely,

(signed) Harold L. Price

Harold L. Price
Director of Regulation

cc: Robert Lowenstein, Esq.
Lowenstein and Newmann
1100 Connecticut Avenue, N. W.
Suite 380
Washington, D. C. 20036

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IOWA ELECTRIC LIGHT AND POWER COMPANY
General Office
CEDAR RAPIDS, IOWA

November 25, 1969

DUANE ARNOLD
CHAIRMAN OF THE BOARD
AND PRESIDENT

Dr. Peter A. Morris
Director
Division of Reactor Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

Re: Duane Arnold Energy Center
AEC Docket No. 50-331

Dear Dr. Morris:

Pursuant to Sec. 50.12 of the Atomic Energy Commission regulations, we hereby request an exemption from the provisions of Sec. 50.10 (b) to allow us to begin certain work prior to issuance of a construction permit.

The scope of, and basis for, such exemption are set forth in further detail in the attachment to this letter.

Sincerely,

Duane Arnold

Duane Arnold
Chairman of the Board
and President

DA:bw

3758

REQUEST FOR EXEMPTION

November 25, 1969

In order that the construction of the Duane Arnold Energy Center - Unit 1 may continue on schedule, we hereby request, pursuant to Section 50.12 of AEC's regulations, an exemption from the provisions of Section 50.10(b) to allow us to begin certain work prior to issuance of a construction permit.

In addition to site excavation, installation of mud slabs, waterproof membrane and working mat, placing of forms and placing and splicing of reinforcing bars for the nuclear structures, and construction work on non-nuclear facilities, all of which are permitted under Section 50.10(b), we wish to proceed with the following:

1. Pouring of concrete for the foundation mats of the reactor building, including the HPCI structure and Pump House No. 1;

2. Construction of the pedestal for erection of the reactor building drywell;

3. Erection of the substructure walls, including the waterproof membrane of the reactor building, HPCI structure and Pump House No. 1 up to ground floor elevation 757'-6".

Details of the work are provided in the attached drawing 7884-SK-C-35. Included in the concrete work would be the necessary piping, grounding, conduit, floor drains, and other embedded items. The quality assurance program outlined in the PSAR will be in effect during the performance of the above work.

Without the Duane Arnold Energy Center, a power deficiency of over 250 mw is forecast for the Iowa Electric Light and Power Company and Central Iowa Power Cooperative for the winter of 1973-74.

As a member of the Iowa Power Pool, applicant is obligated to maintain the capability to meet its own load requirements plus a reserve of 12%.* Projected peak load of the applicant for December 1973 is 718 mw. This load, when increased by

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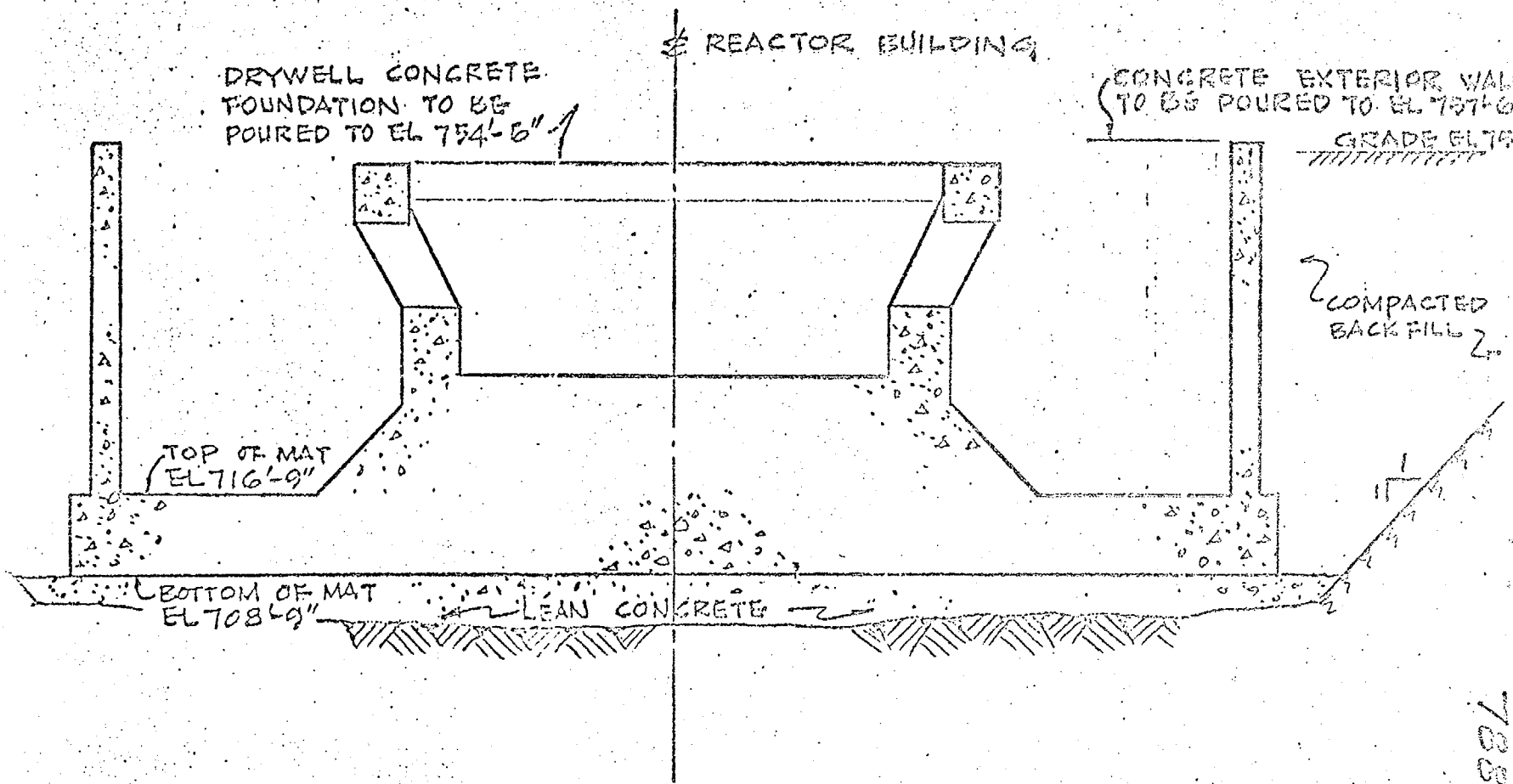
* Capability and load figures given for applicant include Central Iowa Power Cooperative.

the 12% reserve requirement, establishes a projected load requirement (including reserves) of 807 mw in December, 1973.

Applicant's generating capability, aside from the Duane Arnold plant, in December, 1973 will be approximately 556 mw. Consequently, without that plant, applicant will have a generating deficiency of approximately 250 mw.

Prior to December, 1973, applicant will be able to obtain additional energy to meet its load requirements through purchase agreements with other pool members. In view of the substantial deficiency forecast for the winter of 1973-1974 by applicant, without the addition of the Duane Arnold plant, it is urgent that the plant be available for commercial operation in December, 1973.

Any delay in the construction schedule for the plant will seriously affect the applicant's ability to provide reliable service to its customers and to meet its pool commitments in the 1973-1974 winter.



CROSS SECTION
REACTOR BUILDING FOUNDATION WALLS
INC. H.P.C.I AND PUMP HOUSE #1.
(SCOPE OF WORK FOR WHICH EXEMPTION IS REQUESTED)

SIGNATURE Fred Hopper
TITLE DAEC - Iowa Electric Light & Power Co
SUBJECT Foundations Construction Sequence
JOB NO. 7884
SHEET NO. 1
DATE 11/14/69
7884-SK-C-3