

May 9, 1983

TO ALL OPERATING REACTOR LICENSEES AND HOLDERS OF CONSTRUCTION PERMITS

Gentlemen:

SUBJECT: INTEGRATED SCHEDULING FOR IMPLEMENTATION OF PLANT MODIFICATIONS
(GENERIC LETTER 83-20)

On May 3, 1983 the Commission issued Amendment No. 91 (Enclosure 1) to the Duane Arnold Energy Center (DAEC) operating license. This amendment incorporates a license condition which approves Iowa Electric Light and Power Company's "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center."

The Nuclear Regulatory Commission's statement of policy and planning guidance for 1983 endorses the concept of establishing implementation schedules for new and existing requirements which reflect the importance of the safety requirement to the public health and safety and the licensee's ability to complete the necessary engineering, evaluation and design. Enclosure 1 represents the first step towards development of an industry-wide program to establish realistic schedules for implementation of safety improvements, both utility-initiated and NRC-required, at operating reactors.

Enclosure 1 is provided for your information and possible use. Although this enclosure represents an approach which is acceptable at present to the NRC, other approaches may be acceptable and will be considered if you elect to adopt such a plan.

Please contact your Project Manager if you have any questions on this matter.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

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Enclosure:
As Stated

cc: w/enclosure
See Next Page

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INFO-LTR*

OFFICE	ORB#2/DL	ORB#2/DL:BC	AD:L	DL	DL	AD:OR	
SURNAME	KECCLESION:MJ	DVASSALLO	TNOVAK	RAPURPLE	DGEISENHUT	GLAINAS	
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 3, 1983

Docket No. 50-331

Mr. Lee Liu
President and Chief
Executive Officer
Iowa Electric Light and Power Company
P. O. Box 351
Cedar Rapids, Iowa 52406

Dear Mr. Liu:

The Commission has issued the enclosed Amendment No. 91 to Facility Operating License No. DPR-49 for the Duane Arnold Energy Center (DAEC). This amendment incorporates a license condition in response to your application dated November 12, 1982, as revised in subsequent discussions between the NRC and your staff.

This license condition requires Iowa Electric Light and Power Company (IELP) to follow its "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the Plan) and the terms therein for modifying the schedules. The revised Plan has been discussed with your staff and is enclosed as Attachment 1 of Enclosure 2 to this letter.

Iowa Electric's Integrated Scheduling Program has been the subject of extensive discussions between the NRC and your staff in an effort to define an acceptable approach for implementation of this unique program to establish realistic schedules for modification of the Duane Arnold facility. Iowa Electric is to be commended for its initiative in developing such an integrated program for scheduling safety modifications at the DAEC. We hope that the resultant improved control and management of available resources will facilitate more systematic and timely implementation of such modifications.

We believe these discussions have been most productive and, as noted in the enclosed evaluation of your proposed program, conclude that your program is acceptable. However, the implementation of this program represents only the first step towards development of an industry wide program to assure that necessary safety issues are implemented in a timely fashion at all operating reactors. As experience is gained with your program and that of others, program changes may be necessary to incorporate additional or modified features which will enhance program effectiveness and assure timely implementation of safety issues. As

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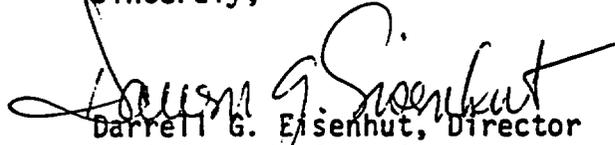
Mr. Lee Liu .

- 2 -

discussed with your staff, in view of recent staff actions and the necessity of awaiting final staff review in a number of areas, the schedules contained in your November 12, 1982 application may require some revisions.

Copies of the Program Evaluation and Notice of Issuance are also enclosed.

Sincerely,



Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 91 to DPR-49
2. Program Evaluation
3. Notice

cc w/enclosures:

See next page

Mr. Lee Liu
Iowa Electric Light & Power Company

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

IOWA ELECTRIC LIGHT AND POWER COMPANY
CENTRAL IOWA POWER COOPERATIVE
CORN BELT POWER COOPERATIVE

DOCKET NO. 50-331

DUANE ARNOLD ENERGY CENTER

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 91
License No. DPR-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Iowa Electric Light and Power Company, et al, dated November 12, 1982 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is amended by adding a new paragraph 2.C(6) to read as follows:

2.C(6) 1. The "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the Plan) submitted on November 12, 1982 (as revised) is approved.

a) The Plan shall be followed by the licensee from and after the effective date of this amendment.

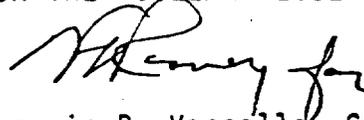
b) The licensee is required to maintain current revisions of, and provide reports regarding, schedules associated with the Plan in accordance with the terms of the Plan and failure to do so shall constitute a violation of this license condition.

c) Changes to dates for completion of items identified in Schedule B do not require a license amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures. Failure to complete items listed in the schedules in accordance with dates there specified shall not constitute a violation of this license condition but may constitute a violation of any regulations, orders or license condition imposing such date.

2. This license amendment shall be effective until May 3, 1985, subject to renewal upon application by the licensee.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Date of Issuance: May 3, 1983



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

INTEGRATED SCHEDULING PROGRAM

EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 9 TO FACILITY LICENSE NO. DPR-49

IOWA ELECTRIC LIGHT AND POWER COMPANY

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 Introduction

By letter dated May 28, 1982, Iowa Electric Light and Power Company (IELP) submitted a request (initial submittal) for approval of a five-year integrated program for implementing self-imposed and NRC-imposed modifications of the Duane Arnold Energy Center (DAEC).

The basic objective of Iowa Electric's (the licensee) program is to enable the utility to obtain better control and management of available resources and to perform required activities in a manner which would enhance plant safety by (1) improved control of safety related modifications and (2) more prompt implementation of these modifications.

On August 11 and August 12, 1982, a meeting was held with IELP and its contractor, Technology for Energy Corporation (TEC), to obtain additional information regarding IELP's submittals and discuss in further detail the licensee's program. This meeting focused on discussing points identified in a preliminary review of the licensee's proposed program and obtaining additional information regarding the details of the methodologies and assumptions used in developing the IELP program to determine the reasonableness of the schedules proposed by the licensee.

As a result of these discussions, the licensee simplified and streamlined its submittal. Iowa Electric requested in a November 12, 1982 application that a requirement to follow its "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the Plan), which was submitted with the November 12, 1982 application, be added as a condition of the operating license for the DAEC.

Further discussions between the NRC and IELP identified additional areas where further clarification of and revisions to Iowa Electric's November 12, 1982 submittal were desirable. The licensee agreed to revise its Plan (Attachment 1) accordingly in response to staff comments.

2.0 Program Description

The program developed by Iowa Electric utilizes a computerized scheduling technique which integrates the engineering, procurement, and installation of planned NRC required modifications, and resultant plant operator retraining requirements, with Iowa Electric's own

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requirements for plant modifications, maintenance, refueling, and operations. The computer model used by the licensee identifies critical paths and considers the interrelationships among projects and the constraints imposed by engineering support and site manpower limitations. The program proposed by the licensee appears to be capable of adapting schedules in the event of unforeseen delays in procurement or installation, strikes, changes in fuel cycle schedules, etc. In addition, the program has considered the necessity of coordinating plant modifications with revisions to plant operating procedures and operator retraining.

The licensee's program, as originally presented, proposed implementation dates as program goals and provided for semi-annual reporting to the NRC of utility progress with regard to implementation of each of the NRC required items and identification of project schedule slippages.

One critical assumption made in the IELP proposed program is that "NRC would not require additional plant modifications during its five year period." However, Iowa Electric has incorporated into its program currently proposed NRC requirements which are likely to be approved for implementation on operating reactors. Proposed requirements (or requirements planned but not finalized, such as an upgraded suppression pool temperature monitoring system) were included for implementation in the IELP program in anticipation of NRC requirements for these items. In addition, the licensee assumed for purposes of its program that the guidance contained in SECY 82-111 concerning Emergency Response Facilities would become requirements.

Iowa Electric indicated in its May 28, 1982 submittal some of the boundary conditions associated with its program. For example, the program assumes in-house engineering support of some 50 personnel, which necessitated deferral of several lower priority design intensive work items. A peak site day-shift manpower loading of some 555 personnel (1985) was set based on worker efficiency, craft availability, and effective management of these resources on-site.

The assumed in-house engineering support of 50 personnel does not include some 148,000 man-hours of engineering support outside of IELP's Mechanical/Nuclear Engineering Department during the five-year period of interest. Assuming approximately 1800 man-hours per work year, this is equivalent to an average of about 17 additional man-years per year over the five year period.

Although not specifically accounting for future new requirements (other than those currently envisaged in its present proposed program) the utility's program is structured so that additional required plant modifications can be integrated into the overall program to identify the impact of such new requirements on the overall schedule.

The Plan submitted by the licensee identifies two categories of modifications. Schedule A identifies schedules for modifications established by existing Rule or Order. Schedule B identifies schedules for completion of:

- 1) regulatory items (of either a generic or plant specific nature) identified by NRC which would result in either a) plant modifications, b) procedure revisions, or c) changes to facility staffing requirements and which have an implementation date committed to by Iowa Electric, and;
- 2) items perceived by IELP as prospective NRC requirements, and;
- 3) all major DAEC tasks resulting from mandates of agencies other than NRC and IELP initiated system upgrades for availability improvement.

3.0 Evaluation

3.1 Implementation

Since any major new requirements could result in significant schedule modifications, IELP suggested in its initial submittal that this program not be implemented by Order or License Condition. Rather, the licensee suggested that it "report semi-annually to the NRC as to its progress with regard to the NRC required items, and as to any slippage which threatens to delay completion of such items beyond the goals specified..."

Such a program would not provide for sufficient accountability and leave NRC with no means of having assurance that NRC-identified regulatory issues are satisfied insofar as completion dates are concerned, short of revoking approval of the program and subsequent issuance of Orders. In subsequent discussions with licensee representatives, they indicated that an Order or License Condition would be acceptable, provided that this Order or License Condition made provisions in some fashion for flexibility in the event that certain requirements could not be done in a timely fashion due to circumstances beyond Iowa Electric's control. New requirements would be incorporated into the licensee's program after appropriate implementation dates have been established.

The licensee's November 12, 1982, submittal (as revised) incorporates an application for amendment to incorporate a license condition requiring that Iowa Electric follow the Plan and permitting the licensee to make changes to the Plan and its schedules for certain category of items in accordance with the provisions of the Plan. We have reviewed the licensee's Plan and have determined that:

- 1) Changes to schedules for completion of modifications imposed by Rule or Order (Schedule 'A' completion dates) will continue to be sought through the exemption or Order-date extension process (For example, Iowa Electric's existing request for exemption from the schedular requirements of 10 CFR 50.44 regarding hydrogen recombiner capability.)
- 2) Schedules for completion of other modifications (Schedule 'B' completion dates) are identified and provisions are made in the Plan to require the utility to provide the NRC with prior written notification of changes to schedule B completion dates to provide the opportunity for further explanation or discussion of such changes.
- 3) Provisions are made

in the Plan for incorporating new or anticipated regulatory items into Schedules A and B as these requirements are identified by NRC and/or formalized by Rule or Order. The licensee's proposal to incorporate a condition into the DAEC operating license which requires Iowa Electric to follow the Plan provides an appropriate mechanism to assure that NRC is informed as to whether required safety modifications are performed in a timely manner. At the same time, the Plan provides a suitable mechanism for changes to completion dates (due to unforeseen circumstances) for modifications not imposed by Rule or Order and for keeping the NRC informed of such changes. Thus, the degree of flexibility needed to assure effective program implementation is provided while at the same time assuring that NRC's responsibilities are not compromised.

Numerous modifications, principally NUREG-0737 items, not specifically identified in the IELP program initially submitted, were considered by the licensee as part of its "base load" of work requirements and grouped together as one or two line items in its forecasted work requirements. The licensee identified in its November 12, 1982 submittal each planned NRC-required modification as an individual line item for inclusion in the implementing vehicle.

Semi-annual reports of utility progress towards meeting NRC required modifications would be provided as proposed by the licensee.

Findings:

The proposal by Iowa Electric to add a license condition requiring the utility to follow the Plan provides a suitable mechanism for implementation of IELP's integrated plan. Completion dates imposed by Rule or Order are unaffected by the Iowa Electric proposal. As new requirements are identified and/or formalized by the NRC provisions are made in the Plan to incorporate these into Schedule A or B, as appropriate. Provisions are made in the Plan to permit the licensee to develop new dates for other modifications (Schedule B) and to keep the NRC informed of such changes.

Each planned NRC required modification is individually identified in the Schedules.

3.2 Proposed Schedules

Attachments 2 and 3 provide Iowa Electric's revision of its initially proposed schedule to include dates for completion of all presently known IELP-planned and NRC-required modifications over the next five years.

For modifications imposed by Rule or Order (other than the schedule requirements of the Interim Hydrogen Control Rule) the utility proposes completion by required dates.

With respect to NUREG-0737 items, the utility also proposes completion of all NUREG-0737 items originally scheduled for completion by 1/1/82 before startup from its 1983 refueling outage as required by Order issued on March 14, 1983. This is acceptable in view of the responsible efforts demonstrated by the licensee and the unforeseen circumstance responsible for the delay. The licensee has shown that adequate compensatory measures are in place. The following discusses the acceptability of other completion dates proposed by IELP in its program.

With respect to items covered by SECY 82-111, schedules were developed before these items were approved by the Commission for implementation on operating reactors. In view of the responsible efforts demonstrated by the licensee, and the lead times necessary for bidding, procurement, and installations of these work items, the schedules proposed by IELP appear reasonable.

Other NRC-identified modifications whose proposed completion dates extend as late as 1986 are essentially limited to modifications associated with the issue of "Control of Heavy Loads." The licensee is conducting an extensive evaluation of this issue to determine the need for modifications to make the DAEC polar crane single-failure proof, demonstrating its responsible effort towards resolution of this issue.

As a compensatory action until modifications to this crane (if any) are completed, Iowa Electric has made procedural revisions and improvements to provide an increased level of safety. We find that the necessity for conducting detailed engineering evaluations of potential modifications to the polar crane justifies a 1986 schedule for these modifications.

Certain schedules for completion of modifications to the Duane Arnold facility are keyed to completion of required NRC staff reviews that would result in subsequent approvals. For example, the schedule for certain modifications required by 10 CFR 50.48 is determined by the date of completion of the staff review. In addition, certain modifications which will be necessary to satisfy the licensee's proposed radiological effluent technical specifications, have been proposed to be completed by the licensee on a schedule determined by completion of the staff review of this issue. Completion dates for such items are identified in Attachment 3. In view of the necessity of awaiting completion of staff reviews on these issues, this is acceptable.

Finally, it is recognized that with issuance of Generic Letter 82-33 pertaining to SECY 82-111, the schedules contained in the November 12, 1982 application may require some revisions. Additionally, the licensee is awaiting final staff action on the review of Iowa Electric's exemption requests associated with Appendix R requirements. However, a schedule update will be provided in accordance with the terms and provisions of the Plan.

Findings

The completion dates for modifications proposed by the licensee in its November 12, 1982 submittal show IELP's responsible efforts towards satisfying NRC requirements. Where the dates proposed by the licensee extend more than about three years in the future, initial action will have been taken by the licensee to provide a high level of safety. Modifications which extend into 1986 or 1987 are of such a nature that full compliance could not reasonably be expected to be attained much sooner. Dates for completion of modifications not yet determined due to the necessity of awaiting staff approval will be included in the licensee's plan after the requisite staff reviews are complete.

Based upon our review of the information contained in IELP's submittals, the dates proposed by the licensee in its November 12, 1982 application appear reasonable.

4.0 Summary

Based on the considerations addressed herein, we find that:

- 1) The proposal by Iowa Electric that its plan be implemented by a License Condition requiring the utility to follow the Plan is acceptable.
- 2) The licensee's proposal that changes to implementation dates imposed by existing Rule or Order will continue to be sought through the exemption or order date extension process is acceptable.
- 3) Schedules for new requirements should be established for the DAEC on a plant specific basis.
- 4) Based upon our review of the dates proposed by the licensee in its November 12, 1982 submittal, the dates proposed by the licensee appear reasonable.

5.0 Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §1.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

6.0 Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: May 3, 1983

Principal Contributor: Kenneth T. Eccleston

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Plan for the Integrated Scheduling of Plant
Modifications of the Duane Arnold Energy Center

I. Introduction

Iowa Electric Light and Power Company (IELP) has developed a comprehensive program which will enable the Company to effectively manage implementation of certain modifications which have been required, or proposed by, the NRC, as well as other measures to enhance plant safety and reliability which have been identified by the Company. A description of the program, identified as "Integrated Program for Modification of the Duane Arnold Energy Center (DAEC)," was submitted to the NRC on May 28, 1982, by Iowa Electric letter LDR-82-0140.

This program was developed to coordinate and schedule all necessary work at the DAEC, whether mandated by NRC or identified by IELP and others. The program objectives are to (1) conform to regulatory requirements; (2) provide sufficient lead times for modifications; (3) minimize changes for operators; (4) assure training requirements are fulfilled; (5) effectively manage financial and human resources; and (6) specify the framework for changes to developed schedules.

This program reflects that fiscal and manpower resources are finite and that a limit on the onsite manpower is necessary. The program integrates all presently planned work at DAEC over a nominal five year period to ensure that individual tasks are effectively scheduled and coordinated. It provides a means for new requirements to be accommodated taking into account schedule and resource constraints.

The purpose of this document is to describe the plan used to implement the program (the "Plan"). It describes how the program functions, mechanisms for changing the Plan and updating it, and the interactions of NRC and licensee staffs under the Plan, and its associated schedules.

II. Summary of Program Development

The program is based on a computer generated listing of over 600 items of prioritized work. The listing takes into account projections for budgets and site manpower and engineering support requirements for five years, on an item-by-item basis covering all plant modification activities. It represents a total DAEC work list and commitment list which is regularly modified and updated to meet changing conditions, including new NRC regulatory requirements. The final product of this program is the development of schedules as discussed below.

III. Scheduling

Upon completion of the complete work listing, Iowa Electric determined that detailed and integrated schedules were required for the major work items. Upon completing the comprehensive listing of major work items, the tasks were organized into Schedules A and B using critical path methodology (CPM) for selected work items. CPM schedules identify critical paths in the work effort for each task, which in turn, enables prompt adaptation of schedules to meet contingencies such as strikes, delays in procurement or installation or modification of fuel cycle schedules. Both Schedules are briefly described below:

- Schedule A - All items which have implementation dates mandated by NRC rules, orders, or license conditions.
- Schedule B - Regulatory items (of either a generic or plant specific nature) identified by NRC which have implementation dates committed to by Iowa Electric and which would result in either a) plant modifications, b) procedure revisions, or c) changes in facility staffing requirements; or items perceived by Iowa Electric as prospective NRC requirements; or major DAEC tasks resulting from mandates of agencies other than NRC and IELP-initiated system upgrades for availability improvement.

Schedule A dates may be modified only with the prior approval of NRC, in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to NRC as described in Section V. Schedules A and B, taken together, provide a basis for assessing the overall effects of changes to schedules and a departure point for discussion between NRC and the licensee regarding such changes, as discussed below.

IV. Schedule Modifications

An important aspect of Iowa Electric's planning effort is the recognition that the attached schedules will need to be

modified at times to reflect changes in regulatory requirements, to accommodate those activities that Iowa Electric finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond IELP's control. It is important that the procedure used by Iowa Electric for changing the schedules be documented.*/ In addition, the NRC must play a role in the oversight of the scheduling process (and must, in fact, judge the acceptability of proposed date changes in Schedule A). Accordingly, it is important that the NRC's role, and the interaction between the NRC and IELP, be clearly defined, as discussed below.

V. IELP Responsibilities

The integrated schedule requires that IELP monitor the progress of all work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

A. Periodic Updating

IELP will update Schedules A and B semi-annually and submit the revised schedules to NRC, beginning six months following NRC concurrence in the Plan. In addition to updating the schedules, IELP will:

- ° Summarize progress in implementing NRC requirements concerning plant modifications
- ° Identify changes since the last report
- ° Summarize the reasons for schedule changes associated with regulatory requirements.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications in the scope of

*/ Schedules A and B will contain sufficient detail to identify those items with completion dates keyed to fuel cycle outages. In such cases, a change in outage period shall not be considered a schedule change.

scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or IELP actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- Assess the priority of the work item and its safety significance
- Schedule the new or changed item to avoid rescheduling other items, if it can be reasonably achieved
- Alter Schedule B items before Schedule A items
- Select a schedule for the new or changed item which will help in maintaining an optimum integrated program of work.

As noted above, no changes will be made in Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after Iowa Electric has determined that rescheduling of non-NRC required work items either will not significantly assist in maintaining Schedule A without change; or that the safety, cost or schedule penalties from rescheduling non-NRC required work significantly outweigh the change in a Schedule A completion date.

Iowa Electric will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When IELP determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

Work items in Schedule B may be rescheduled or work items may be added to Schedule B by Iowa Electric without NRC approval; however, IELP will inform the NRC Project Manager when serious consideration is given to changing the schedule for or adding an item in Schedule B.

In addition, at least 30 days (unless otherwise agreed to by the NRC Project Manager or unless circumstances beyond IELP's control arise within 30 days of the scheduled date) before IELP adopts a

change for an item in Schedule B (as defined in Section III above), it will provide the NRC written notification thereof, including the reasons therefor and any compensatory actions instituted. If not provided 30 days in advance, such notification will be provided by IELP as promptly as practicable. NRC may request further explanation or discussion concerning such change. In this event, discussions will be initiated with the NRC Project Manager. However, IELP changes in scheduled dates will be effective unless subsequently modified by IELP.

VI. NRC Review

As pointed out in Section V.B above, changes to the schedules are inevitable. Action required by NRC is discussed below:

A. Iowa Electric Originated Changes

1. Upon receipt from IELP of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to consider and decide on the request in accordance with applicable procedures.
2. If the request for a modification of Schedule A is denied, NRC shall promptly inform Iowa Electric and provide the reasons for denial.
3. NRC consideration of IELP changes in non-Schedule A items is covered by V.B.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action the NRC, to the extent consistent with its overall regulatory responsibilities and, unless public health, safety, or interest require otherwise, will take into account the impact of such action on IELP's ability to complete effectively the items on Schedules A, and B, and, in consultation with IELP, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and IELP recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if

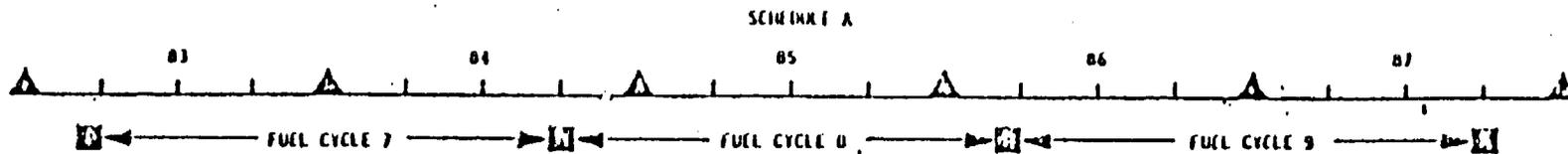
practicable), the NRC will provide IELP a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be approved by NRC in accordance with established procedures, and will thereupon be reflected in a revised Schedule A submitted by IELP. IELP will inform the NRC of any resulting changes in Schedule B in accordance with Section V. above.

C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in a) plant modifications, b) procedure revision or development, or c) changes in facility staffing requirements. For issues as to which NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussions between IELP and the NRC staff. As for the case of NRC-originated changes to Schedule A items, the NRC will provide IELP a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by IELP.

VII. Modifications to the Plan

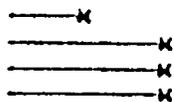
The licensee and the NRC recognize that the Plan itself may require future modifications. Accordingly, IELP will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes will be made effective upon amendment issuance by NRC.



OUTAGES

MARK I

- a) Major*
- b) Minor
- c) Plant Unique Analysis
- d) SPMS



II. RECEIVERS

(Note 1)

- Equipment Qualification * _____ X
- App. R Alternate * _____ X
- Shutdown _____ X

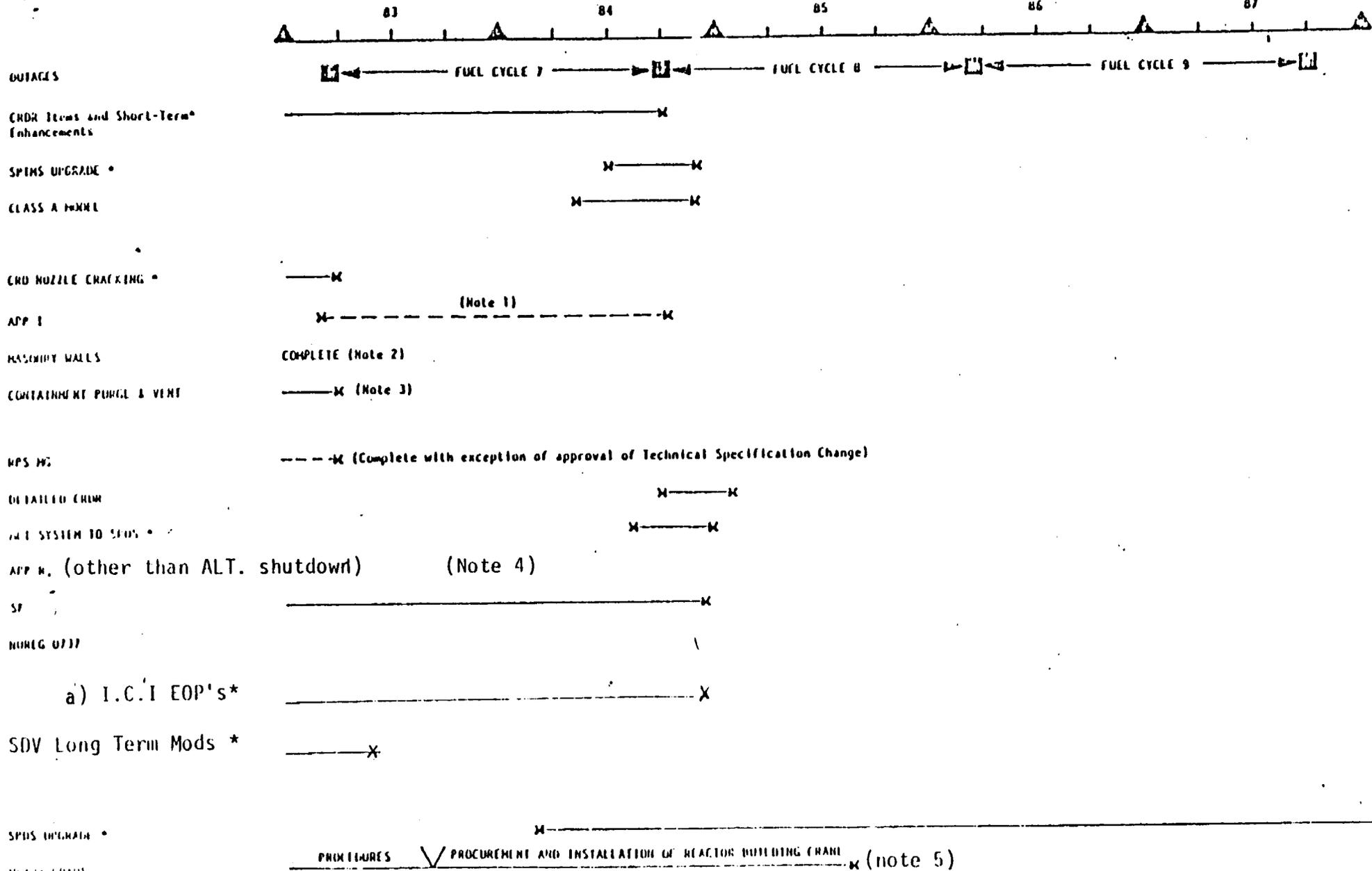
NUREG-0737

- a) 11.B.3 PASS * _____ X
- b) 11.F.3.27 Common Reference * Level _____ X
- c) 11.D.3.4 Control Room * Habitability _____ X
- d) 11.D.3.1 and 3.2 Accident Monitoring _____ X

Note 1. IIP letter, LOR-82-056, Dated March 18, 1982 requests exemption from this date.

* Completion date linked with end of refueling outage.

SCHEDULE B



UNITED STATES NUCLEAR REGULATORY COMMISSIONDOCKET NO. 50-331IOWA ELECTRIC LIGHT AND POWER COMPANY, ET ALNOTICE OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 91 to Facility Operating License No. DPR-49 issued to Iowa Electric Light and Power Company, Central Iowa Power Cooperative, and Corn Belt Power Cooperative, which revises the License for operation of the Duane Arnold Energy Center, located in Linn County Iowa. The amendment is effective as of its date of issuance.

The amendment incorporates a license condition requiring the licensee to follow its "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center."

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR 51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

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For further details with respect to this action, see (1) the application for amendment dated November 12, 1982. (2) Amendment No. 91 to License No. DPR-49, and (3) the Commission's related Program Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D.C. and at the Cedar Rapids Public Library, 426 Third Avenue, S.E., Cedar Rapids, Iowa 52401. A copy of items (2) and (3) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland, this 3rd day of May 1983.

FOR THE NUCLEAR REGULATORY COMMISSION



Vernon L. Rooney, Acting Chief
Operating Reactors Branch #2
Division of Licensing