



FPL Energy Duane Arnold, LLC  
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**FPL Energy.**

**Duane Arnold Energy Center**

July 21, 2006

NG-06-0490  
10 CFR 50.90

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

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

Follow-up Response to Request for Additional Information Related to the Proposed Amendment to Revise the Surveillance Requirements for the Emergency Diesel Generators to Provide More Margin to the Acceptance Criterion (TAC NO. MC8343)

- References:
- 1) G. Van Middlesworth (FPL Energy Duane Arnold) to USNRC, "Response to Request for Additional Information Related to the Proposed Amendment to Revise the Surveillance Requirements for the Emergency Diesel Generators to Provide More Margin to the Acceptance Criterion (TAC NO. MC8343)," dated June 16, 2006.
  - 2) D. Spaulding (USNRC) to G. Van Middlesworth (FPL Energy Duane Arnold), "Duane Arnold Energy Center - Request for Additional Information Related to the Proposed Amendment to Revise the Surveillance Requirements for the Emergency Diesel Generators to Provide More Margin to the Acceptance Criterion (TAC NO. MC8343)," dated May 24, 2006.

In Reference 1, FPL Energy Duane Arnold, LLC (FPL Energy Duane Arnold) responded to an NRC Staff Request for Additional Information transmitted by Reference 2. Subsequently, the Staff contacted us to request clarification of some information contained in that response. Specifically, FPL Energy Duane Arnold will, as part of the resolution of the existing non-conforming condition on the Duane Arnold Energy Center (DAEC) Emergency Diesel Generators (EDGs), as described in Reference 1, restore conformance with our commitment to NRC Safety Guide 9 for the EDGs to maintaining minimum bus voltage (> 75% nominal) between load groups, as described in the DAEC Updated Final Safety Analysis Report (UFSAR), Section 1.8:9.4. This resolution is being tracked in the DAEC corrective action program as CAP39229, with a due date of prior to startup from the next refuel outage, scheduled for February/March 2007.

ADD01

The Staff also requested that FPL Energy Duane Arnold provide some discussion relative to the plans and schedules for replacement of the existing Woodward governor assemblies on the DAEC EDGs. FPL Energy Duane Arnold is replacing these governors as part of the DAEC life cycle management program, due to parts obsolescence with the current governor model. This is considered an enhancement to the above corrective actions to restore conformance with our UFSAR commitments to Safety Guide 9. Until FPL Energy Duane Arnold gains operating experience with the new governor assemblies, we believe that it is prudent to replace them on a staggered basis, so as to avoid any potential common cause failure concerns. We also have reservations about performing the requisite post-modification testing during power operation and therefore, have decided to defer installation of the second governor assembly until the 2009 refuel outage. As noted in Reference 1, the "A" EDG governor assemblies have been replaced, providing additional confidence of their performance until the 2009 refuel outage. FPL Energy Duane Arnold believes that the above plan and schedule appropriately balances overall plant risk against upgrading the existing governor assemblies on a shorter schedule.

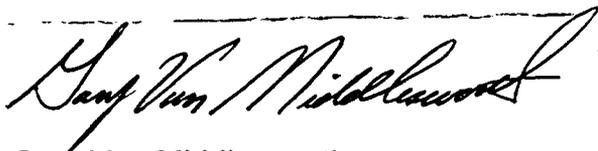
This letter makes the following new commitment in this letter:

Prior to startup from the next refuel outage (RFO20), FPL Energy Duane Arnold will implement the provisions of NRC Safety Guide 9 for the EDGs to maintain minimum bus voltage (>75% nominal) between load groups, as described in the DAEC UFSAR Section 1.8.9.4.

If you have any questions or require additional information, please contact Mr. Tony Browning at (319) 851-7750.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 21, 2006.



Gary Van Middlesworth  
Vice President, Duane Arnold Energy Center  
FPL Energy Duane Arnold, LLC

cc: Administrator, Region III, USNRC  
Project Manager, DAEC, USNRC  
Resident Inspector, DAEC, USNRC  
D. McGhee (State of Iowa)