



FPL Energy

Duane Arnold Energy Center

FPL Energy Duane Arnold, LLC
3277 DAEC Road
Palo, Iowa 52324

November 6, 2006

NG-06-0757

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

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

Change in Commitment

Reference: Letter from G. Van Middlesworth (NMC) to USNRC, "License Event Report #2005-004-00," NG-05-2161, dated November 28, 2005, ML053360261.

In the above referenced letter, Nuclear Management Company (NMC)¹ made the following commitments:

1. Duane Arnold Energy Center will perform an analysis of the effects on HPCI discharge piping heating caused by "turbulent penetration." This action is due March 17, 2006.
2. After completion of the analysis performed under commitment 1, existing Technical Specification Surveillance Requirements basis will be reviewed and revised based on the results of the analysis. This action is due April 28, 2006.

We have completed actions associated with commitment #1 above. The results of the extensive and detailed analysis determined that there was no impact on High Pressure Coolant Injection (HPCI) system operability due to the presence of a steam bubble. Other actions completed include the performance of a special test (SpTP-212, HPCI Keep Fill Special Test) on September 14, 2006. The purpose of SpTP-212 was to determine whether a keep fill system, which maintains the piping system pressurized, would eliminate the steam bubble in the HPCI piping near the motor operated injection valve, MO-2312. This test pressurized the HPCI injection line to determine the pressure at which the steam bubble would collapse and subsequently reform during depressurization. As a result of the information obtained from SpTP-212, FPL Energy Duane Arnold is developing additional design modifications for installation during Refuel Outage (RFO) 20 which is scheduled for spring 2007. The scope of these modifications includes the following:

1. Installation of a HPCI Keep Fill System

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¹ By License Amendment 260, dated January 27, 2006, the facility operating license and operating authority for the Duane Arnold Energy Center was transferred to FPL Energy Duane Arnold, LLC.

This modification will connect a permanent keep fill source from the Condensate Service System with adequate pressure to prevent formation of a steam bubble in the HPCI injection line. The modification will include automatic means to limit the pressure rise due to heating of the water solid piping near MO-2312, provisions for monitoring injection line pressure, and any revisions/updates necessary for the Technical Specification Bases and Updated Final Safety Analysis Report (UFSAR).

Design development of the planned modifications included benchmarking of other plants with HPCI keep fill systems. This benchmarking effort included FPL Energy Duane Arnold personnel traveling to other sites for the purpose of gaining additional insight into design and licensing issues.

2. Relocation of the HPCI High Point Vent Line

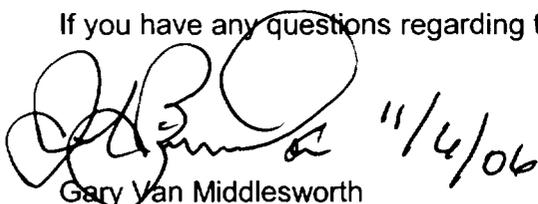
The vent line is being relocated/modified to minimize personnel dose and to address personnel safety concerns associated with venting evolutions at elevated fluid temperatures (i.e., approaching 300 degrees F) near MO-2312. (Note that the Reactor Core Isolation Cooling (RCIC) vent line is also being relocated.)

In regards to original commitment #2, the due date is being extended to coincide with the planned modifications. The new due date for this commitment is April 27, 2007.

Based on the final corrective actions for the HPCI steam bubble issue being the above described modifications, this letter contains the following new commitments:

1. Install a HPCI Keep Fill System by startup from RFO 21. The intent is to install the modification during RFO 20 pending delivery of required parts. This action will be completed by March 1, 2009.
2. Relocate the HPCI High Point Vent Line during RFO 20. This action will be completed by March 30, 2007.

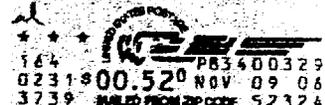
If you have any questions regarding this matter, please contact S. Catron at (319) 851-7234.



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