



NG-09-0645  
10 CFR 54

September 3, 2009

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

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

Response to Request for Additional Information Regarding Section 2.5 of the Duane Arnold Energy Center License Renewal Application

- References:
1. Letter, Richard L. Anderson (FPL Energy Duane Arnold, LLC) to Document Control Desk (USNRC), "Duane Arnold Energy Center Application for Renewed Operating License (TSCR-109)," dated September 30, 2008, NG-08-0713 (ML082980623)
  2. Letter, Richard L. Anderson (FPL Energy Duane Arnold, LLC) to Document Control Desk (USNRC), "License Renewal Application, Supplement 1: Changes Resulting from Issues Raised in the Review Status of the License Renewal Application for the Duane Arnold Energy Center," dated January 23, 2009, NG-09-0059 (ML090280418)
  3. Letter, Maurice Heath (USNRC) to Richard L. Anderson (FPL Energy Duane Arnold, LLC), "Request for Additional Information for the Review of the Duane Arnold Energy Center License Renewal Application – Section 2.5 (TAC No. MD9769)," dated August 7, 2009 (ML091980178)

By Reference 1, FPL Energy Duane Arnold, LLC submitted an application for a renewed Operating License (LRA) for the Duane Arnold Energy Center. Reference 2 provided Supplement 1 to the application. By Reference 3 the U.S. Nuclear Regulatory Commission (NRC) Staff requested additional information regarding Section 2.5 of the LRA.

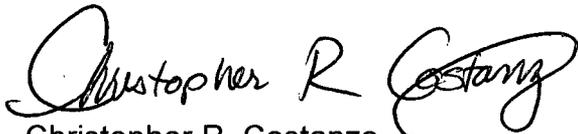
The enclosure to this letter contains the NextEra Energy Duane Arnold, LLC, (f/k/a FPL Energy Duane Arnold, LLC) responses to the Staff's request for additional information.

This letter contains no new commitments or changes to existing commitments.

If you have any questions or require additional information, please contact Mr. Kenneth Putnam at (319) 851-7238.

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

Executed on September 3, 2009.



Christopher R. Costanzo  
Vice President, Duane Arnold Energy Center  
NextEra Energy Duane Arnold, LLC

Enclosure: DAEC Response to NRC Request for Additional Information Regarding  
LRA Section 2.5

cc: Administrator, Region III, USNRC  
Project Manager, DAEC, USNRC  
Senior Resident Inspector, DAEC, USNRC  
License Renewal Project Manager, USNRC  
License Renewal Inspection Team Lead, Region III, USNRC  
M. Rasmusson (State of Iowa)

**Enclosure to NG-09-0645**  
**DAEC Response to NRC Request for Additional Information**  
**Regarding LRA Section 2.5**

**RAI 2.5-1**

The Duane Arnold License Renewal Application states that the scoping and screening methodology follows the approach recommended in NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 -The License Renewal Rule," Appendix B, which indicates that elements, resistance temperature detectors (RTDs), sensors, thermocouples and transducers should be included in the list of components/ commodity groups subject to aging management review if a pressure boundary is applicable. Provide justification why these components are not included in Section 2.5 of the License Renewal Application.

**DAEC Response to RAI 2.5-1**

The intended function of pressure boundary for instrumentation is addressed as part of the mechanical scoping and screening process. Instrumentation with a pressure boundary application was included in the mechanical aging management review and is managed by mechanical aging management programs. For additional information on the treatment of instrumentation pressure boundaries in LRA Section 2 and 3 tables, see the NextEra Energy letter NG-09-0644, dated September 3, 2009, Response to Request for Additional Information Regarding Section 2.3 of the Duane Arnold Energy Center License Renewal Application.

The electrical intended functions are active functions. Therefore, the electrical aspects of the instrumentation addressed in Section 2.5 screen out as not being subject to aging management review.