CHARLES V. SANS CRAINTE, P.E.
Vice President, Generation

DAIRYLAND POWER
COOPERATIVE

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February 23, 2011

In reply, please refer to LAC-14159

DOCKET NO. 72-46

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir or Madam:

SUBJECT: Dairyland Power Cooperative (DPC)
La Crosse Boiling Water Reactor (LACBWR)
Possession-Only License No. DPR-45
Request for Exemption from Certain Requirements of 10 CFR 73.55 for the Independent Spent Fuel Storage Installation

REFERENCE:
(1) NRC Letter, Watson to Brasel, dated August 2, 2010, La Crosse Boiling Water Reactor – Revised Power Reactor Security Rule

(2) Letter dated December 1, 2010, DPC to NRC, Request for Exemption from Certain Requirements of 10 CFR 73.55 (for LACBWR)

(3) Letter dated February 23, 2011, DPC to NRC, Changes to Physical Security Plan, Security Force Training & Qualification Plan and Safeguards Contingency Plan

Pursuant to 10 CFR 73.5, "Specific Exemptions," Dairyland Power Cooperative (DPC), as licensee, requests exemptions from certain requirements of 10 CFR 73.55 for the LACBWR Independent Spent Fuel Storage Installation (ISFSI).

The requested exemptions from the requirements set forth in 10 CFR 73.55 are commensurate with the reduction in risk to the health and safety of the public posed by a stand alone ISFSI. DPC has made good faith efforts to comply with the regulations. These exemptions do not address an immediate security concern, but rather are being submitted to comply with Reference 1 and 2 for implementation of the ISFSI. A similar exemption request, Reference 2, was submitted to the NRC for LACBWR previously in response to Reference 1, and to date, that exemption request remains pending approval.

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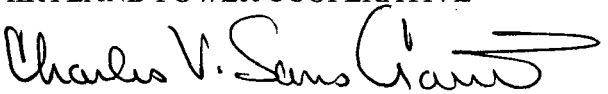
Enclosure 1 provides the basis for the exemptions as required by Reference 1. These exemptions do not endanger life, property or the common defense and security, and are otherwise in the public interest in accordance with 10 CFR 73.5.

DPC anticipates that the first fuel-loaded cask will be placed at the ISFSI in late August or early September 2011. Implementation of the ISFSI Security Plan will be completed 90 days prior to this milestone.

If you have any questions regarding this exemption request, please contact LACBWR Plant Manager Mike Brasel at (608) 689-4220.

Sincerely,

DAIRYLAND POWER COOPERATIVE



Charles V. Sans Crainte, Vice President, Generation

CVS:MAB:jkl

Enclosure (SGI): 1. Evaluation of Proposed Exemptions for ISFSI

cc w/ enclosure:
John Hickman, NRC Project Manager
Mark Satorius, Regional Administrator, NRC Region III

cc w/o enclosure:
Gene Bonano, NRC Security Inspector, NRC Region III
Paul Schmidt, Manager, Radiation Protection Section, State of Wisconsin

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STATE OF WISCONSIN)
)
COUNTY OF LA CROSSE)

Personally came before me this 23 day of February, 2011, the above named Charles V. Sans Crainte, to me known to be the person who executed the foregoing instrument and acknowledged the same.

Laurie A. Engen
Notary Public, La Crosse County

My commission expires 5-25-14

LAURIE A. ENGEN
Notary Public
State of Wisconsin