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 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Expresses interest in continuation of integrated plan for plant mods for another 2 yr period.

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Iowa Electric Light and Power Company

April 14, 1989

NG-89-0945

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Plan for the Integrated Scheduling of Plant
Modifications for the DAEC (Integrated Plan)
RTS-226
File: A-117, A-278

Dear Dr. Murley:

On November 25, 1987, the Commission issued Amendment No. 148 to our Facility Operating License No. DPR-49. Amendment No. 148 approved our Plan for the Integrated Scheduling of Plant Modifications for the DAEC (Integrated Plan) and incorporated a condition requiring IE to follow the Plan. By its own terms, Amendment No. 148 expires on May 3, 1989. This application for license amendment seeks to extend the license condition for another two years.

We feel the Integrated Plan has been beneficial both to us and the NRC in scheduling plant modifications. We, therefore, wish to continue the Integrated Plan for another two-year period. Attachment 2 to this letter is the Integrated Plan which was originally approved by Amendment No. 91. It is enclosed for your convenience.

This proposed change request, RTS-226, has been reviewed by both the DAEC Operations Committee and Safety Committee.

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Dr. Thomas E. Murley
April 7, 1989
NG-89-0945
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Pursuant to the requirements of 10 CFR 50.91, a copy of this submittal is being forwarded to our appointed state official.

This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By *Daniel L. Mineck*
DANIEL L. MINECK
Manager, Nuclear Division

Subscribed and sworn to before me on
this 17th day of April, 1989.

Kathleen M. Furner
Notary Public in and for the State of Iowa

DLM/PLB/pjv+

- Attachments:
- 1) Description of Change and Evaluation with Respect to 10 CFR 50.92
 - 2) Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center
 - 3) Draft Amendment

cc: P. Bell
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
J. Eure (State of Iowa)
Commitment Control

DESCRIPTION OF CHANGE AND EVALUATION OF CHANGE
WITH RESPECT TO 10 CFR 50.92

Description of Change

This change to Facility Operating License No. DPR-49 effectively extends for two years Amendment No. 148 to DPR-49 which would expire May 3, 1989. Amendment No. 148 approved Iowa Electric Light and Power Company's Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center (Integrated Plan). This plan was developed to enable the Company to manage effectively 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.

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 that training requirements are fulfilled; (5) effectively manage financial and human resources; and (6) specify the framework for changes to developed schedules.

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

Evaluation of Change with Respect to 10 CFR 50.92

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards consideration based upon the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No. This license amendment is purely administrative in nature and has no effect on existing plant systems or equipment. Therefore, the probability or consequences of an accident are not increased.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No. This license amendment is purely administrative in nature and has no effect on existing plant systems or equipment. Therefore, the possibility of a new or different kind of accident has not been created.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No. This license amendment is purely administrative in nature and has no effect on existing plant systems or equipment. Therefore, there is no reduction in the margin of safety.

In the April 6, 1983 Federal Register the NRC published examples of amendments that are not likely to involve a significant hazards concern. Example number (i) of that list is a purely administrative change to the Technical Specifications. The incorporation of a license condition requiring continued use of a plan to provide for scheduling modifications and notification of scheduling changes is purely administrative. In addition, the NRC Staff has determined that approval of the Plan and adoption of Amendment No. 148 did not involve a significant hazards consideration (see Staff evaluation dated November 25, 1987).

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

- I. 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 on-site 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.⁽¹⁾ 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

(1) 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.

- 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 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 schedules 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 therefore 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.

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 LICENSEE

Amendment No. _____
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 April 14, 1989, 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.
2. Accordingly, the license is amended by revising subparagraph 2 of paragraph 2.C(6) to read as follows:
 2. This license amendment shall be effective until May 3, 1991, 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

John N. Hannon, Director
Directorate III-3
Division of Reactor Projects - III/IV/V
and Special Projects

Date of Issuance: _____