

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL:50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331  
 AUTH.NAME AUTHOR AFFILIATION  
 ROOT,L.D. Iowa Electric Light & Power Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to 800507 ltr re addl TMI-2 requirements.Total  
 assessment of collective impact not yet conducted.Possible  
 alternatives to requirements include equal or better safety  
 mods & exception to unnecessary recommendations.

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Iowa Electric Light and Power Company

June 23, 1980  
LDR-80-168

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
NUCLEAR GENERATION

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, DC 20555

Dear Mr. Eisenhut:

This letter is a response to your letter dated May 7, 1980 concerning five additional TMI-2 related requirements to operating reactors.

It is the intention of Iowa Electric Light and Power Company to be fully responsive to the requirements of your letter which apply to the Duane Arnold Energy Center, however, well defined acceptance criteria for many of the recommendations are needed in order to ensure proper implementation. These acceptance criteria, when fully developed, may impact implementation schedules due to the availability of resources for conducting the required studies and developing the required designs.

A total assessment of the collective impact of all the requirements has not yet been conducted. Following a comprehensive review of the requirements, we may wish to discuss with the NRC Staff alternatives to the interpretation of some requirements. Such alternatives include: a) modifications other than those suggested by the requirement of equal or better safety improvement; b) design and test of hardware modifications on a single typical plant followed by implementation on remaining plants; c) exception to some recommendations whose implementation is believed unnecessary. Thus, we believe a degree of flexibility is necessary in the implementation schedules for good cause shown. However, within the constraints described above, it is our intent to meet the requirements and schedules of your letter.

We trust this letter is responsive to your requirements at this time. If additional clarification of our position is necessary, please do not hesitate to contact us.

Very truly yours,

*Larry D. Root*

Larry D. Root  
Assistant Vice President  
Nuclear Generation

LDR/KAM/mz

cc: K. Meyer

D. Arnold

L. Liu

S. Tuthill

D. Mineck

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