

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8203090512 DOC. DATE: 82/03/02 NOTARIZED: NO DOCKET #  
 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  
 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Proposed late Apr 1982 meeting to discuss detailed computer based critical path schedule for safety parameter display sys, meteorology upgrades, Reg Guide 1.97, control room design review & addl mods for integrated emergency response plan.

DISTRIBUTION CODE: A045S COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2  
 TITLE: Emergency Plan Information/NURG 0696 Comments

NOTES:

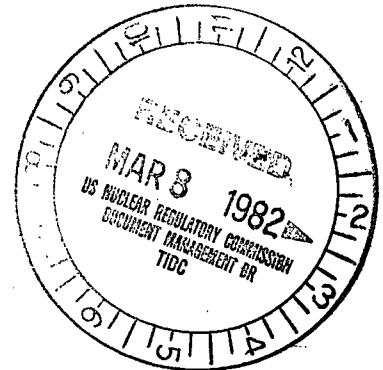
	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
ACTION:	ORB #2 BC	1	ECCLESTON, K. 01	1
INTERNAL:	IE 10	2	IE/DEP DIR	1
	IE/DEP/EPDB 12	1	IE/DEP/EPLB 06	4
	NRR/DL/ORAB	1	NRR/DSI/AEB	1
	NRR/DSI/RAB	1	REG FILES 04	1
EXTERNAL:	INPO, J. STARNES	1	LPDR 03	1
	NRC PDR 02	1	NTIS 05	1

TOTAL NUMBER OF COPIES REQUIRED: LTTR 18 ENCL 1

**Iowa Electric Light and Power Company**

March 2, 1982  
LDR-82-044

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
NUCLEAR GENERATION



Mr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Denton:

Our letters LDR-81-329 dated November 30, 1981, concerning Emergency Response Facilities, LDR-81-342 dated December 15, 1981, concerning control of heavy loads, and LDR-82-003 dated January 5, 1982, concerning meteorology all deferred commitments to a schedule based on our plans to discuss an integrated schedule of all NRC commitments in mid-January 1982 with your staff.

Our efforts to date to develop a fully integrated program indicate that we underestimated the technical complexity of the project and hence were overly optimistic in our ability to develop this plan in the time frame we indicated. We are making significant progress in developing the integrated program, however, and it is still our intent to present your staff with our plan upon completion. Our Karl Meyer met with your Mr. Dominic Vassallo on January 19, 1982, at which time he presented an outline of the manner in which Iowa Electric is developing the plan. Additionally, Karl Meyer has scheduled a follow-up meeting with your Dominic Vassallo on March 4, 1982.

Some of the difficulty in developing this plan is that our planning addresses actions and systems which do not have firm current regulatory requirements, such as Safety Parameter Display System and Regulatory Guide 1.97. Our work to date has clearly indicated to us that implementation of the staff's retrofitting proposals in a manner which is consistent with nuclear safety considerations, as well as fiscally responsible, may not be possible within some of the time frames suggested so far in the NRC staff proposals.

With the assistance of our consultants, we are presently preparing a detailed computer-based critical path schedule for the Safety Parameter Display System, Meteorology Upgrades, Regulatory Guide 1.97, Control Room Design Review, and other desirable modifications to define an integrated program, including schedules. Upon completion of the integrated program preparation, we will evaluate the effects on other schedules and make our presentation to you preliminary to filing the program with you together with our application for approval of proposed schedules for implementation.

8203090512 820302  
PDR ADOCK 05000331  
P PDR

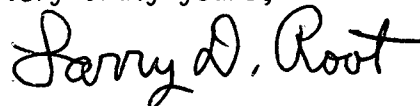
\* 1882 - A CENTURY OF SERVICE - 1982 \*

A045  
1/0

Mr. Harold Denton  
March 2, 1982  
LDR-82-044  
Page Two

We now propose that a meeting be scheduled with your staff for late April, 1982, at which time we expect to be prepared to discuss in detail the schedules required for the above modifications. In the meantime, Mr. Meyer will schedule meetings with your staff to make interim reports on our progress.

Very truly yours,

A handwritten signature in cursive script that reads "Larry D. Root".

Larry D. Root  
Assistant Vice President  
Nuclear Generation

LDR/KAM/jlm\*

cc: Karl A. Meyer  
D. Arnold  
L. Liu  
S. Tuthill  
NRC Resident Office  
Ken Eccleston (NRC)