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 ROOT,L.D. Iowa Electric Light & Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 DENTON,H,R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards proposed "Integrated Program for Mod of Duane Arnold Energy Ctr." Program will develop comprehensive guidelines for implementation of mods.Approval requested.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)
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Iowa Electric Light and Power Company

May 28, 1982
LDR-82-0140

50-331

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
OF NUCLEAR DIVISION

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

Dear Mr. Denton:

This letter constitutes an application on behalf of Iowa Electric Light and Power Company (IELP) for NRC approval of a proposed integrated program for modification of the Duane Arnold Energy Center (DAEC). The program is described in the attached document entitled, "Integrated Program for Modification of the Duane Arnold Energy Center."

The program was initiated by IELP in order to develop a comprehensive program which would enable IELP effectively to manage certain modifications to the plant, some of which have either been required by NRC (e.g., NUREG-0737) or proposed by NRC (e.g., Emergency Response Facilities, SECY-82-111), while at the same time preserving plant safety and reliability. For this purpose, the program is designed to integrate the engineering, procurement and installation of planned NRC retrofit requirements, and resulting requirements for plant operator re-training, with the utility's own perceived requirements for plant modifications, inspection and maintenance, and fuel cycle schedules and operating plans. The program is designed to enable the utility to manage these activities effectively in the interest of enhanced plant safety and, secondarily, but importantly, fiscal prudence. The ultimate goal is compliance with NRC requirements and the continuance of safe, reliable operation.

The utility's program has involved development of computerized schedules for major tasks which permit ready identification of critical paths and will enable prompt adaptation of schedules to meet such contingencies as delays in procurement or installation, strikes, modifications of fuel cycle schedules, and so forth. The effort has involved estimates as to engineering and construction manpower efforts and scheduling of work to assure that these requirements do not at any given time exceed prudent management capability. Central to all the planning has been the overriding need to assure that plant modifications are coordinated with the revision of plant operating procedures and re-training of plant operators.

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We have developed the attached five-year program on the assumption that NRC would not require additional plant modifications during its five-year period. The program is, however, flexible and readily adaptable to imposition of new NRC requirements through use of the computer model which permits integration of additional plant modification programs with those currently planned. Through its use of critical path methodology, it permits the reformation of schedules where new requirements require delays in previous schedules. Hence, the program has been developed and can be administered as a living program with the capability of adaptation to changing regulatory requirements, new technological developments, changes in plant operating cycles, unavoidable delays in retrofit programs, and other contingencies.

The attached program description identifies numerous commitments, whether self-imposed or required by NRC or other organizations, such as American Nuclear Insurers, INPO, or others, together with significant commitments we regard as likely to be imposed. Among NRC requirements or proposed requirements, or measures under consideration to implement NRC requirements, these include remaining NUREG-0737 requirements, suppression pool temperature monitoring system (SPTMS), safety parameter display system (SPDS), emergency response facilities (NUREG-0696), plant process computer (PPC)*/ changeout, control room design review and emergency operating procedures (EOP), environmental qualification of electrical equipment (Generic Letter 79-01B), a new auxiliary electrical equipment room (AEER), and instrumentation to follow the course of an accident (Reg. Guide 1.97), among others.**/ Based on various considerations described in detail in the attachment, and with the aid of the computer program, proposed completion dates have been derived and set forth in the attachment for many of the items, including those listed above.

Based upon the concept of a "living schedule," completion dates are proposed in the attachment (see page IV-2 and IV-3) as program goals, not as firm completion dates to be required by Commission order. The dates appear to us to be reasonably achievable, and we intend to be diligent in achieving them. It should be expected, however, that some of the activities may not

*/ Installation of a new plant process computer is not a specific requirement of the NRC. It is a part of this integrated program because the new computer is needed to meet IELP's operating requirements and will also be used in complying with NRC requirements.

**/ The new auxiliary electrical equipment room is a facility modification under consideration by IELP, in order to meet both NRC and plant requirements. Such a room, however, is not a requirement of the NRC.

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be completed by the proposed dates. The attachment provides that IELP will report semi-annually to the NRC as to its progress with regard to each of the NRC required items, and as to any slippage which threatens to delay completion of such items beyond the goals specified in the attachment. In any case of such slippage, we would specify a new program goal date. We would expect to meet periodically with representatives of NRC to review our progress; and we would expect that representatives of NRC would periodically audit our implementation of the program to verify that we are carrying it out in good faith.

It is contemplated by this application that the program goals specified in the attachment (Figures IV-1 and IV-2) would upon Commission approval of this program supersede any completion dates for the same tasks in pertinent Commission issuances heretofore or hereafter issued by the Commission, unless such issuance is expressly made applicable to the DAEC by specific reference in the NRC issuance. NRC required completion dates which would be superseded by approval of this application include the hydrogen recombiner capability for which an extension of time has been requested.* We are not presently aware of any other completion dates specified in current Commission requirements or proposed requirements which would be extended by Commission approval of IELP's proposed program.

Implementation of IELP's integrated program would not be foreclosed by any current technical specifications incorporated in the DAEC license, although NRC and IELP may regard it as desirable to amend the technical specifications to reflect changes in the DAEC which result from implementation of the proposed program.

Accordingly, we hereby apply for NRC approval of the program as set forth in the attachment to this letter. This approval would entail approval of the proposed completion dates for NRC requirements set forth in Figures IV-1 and IV-2 of the attachment as program goals and not as legally required compliance deadlines; and imposition on the licensee of the semi-annual reporting requirement as proposed above.

We would be pleased to submit for NRC consideration a draft of proposed action approving this application. We would also be pleased to respond to any requests for further information concerning this application and our proposed program, and to meet with the staff to discuss this application and IELP's proposed integrated program.

* IELP Letter March 18, 1982, L.D. Root to H. Denton

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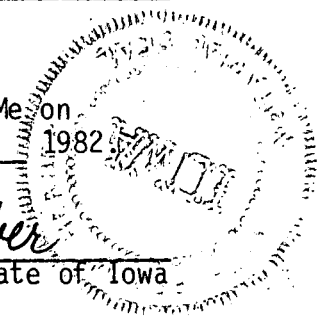
IE contemplates that a number of matters dealt with in this application will need to be clarified through future discussion with the NRC staff and confirmed by appropriate documentation. Among others, these matters include NRC approval of the criteria or basic specifications proposed by IE for those modifications which are being undertaken to satisfy NRC requirements. Such approvals may constitute important steps which should be satisfied before firm commitments are made by the applicant, and the time required to obtain such approvals may affect the applicant's schedule.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY Larry D. Root
Larry D. Root

Subscribed and sworn to Before Me on
this 28th day of May 1982

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



LDR/KAM/jlm*

cc: D. Arnold
S. Tuthill
L. Liu
L. Root
K. Meyer
K. Eccleston
NRC Resident Office