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ROOT, L.D. Iowa Electric Light & Power Co.

RECIPIENT AFFILIATION

DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits info supporting request for extension for implementation of hydrogen control interim requirements. Due to overlap of activities, combiner installation will exceed 18 months & thus cannot be completed during 1983 outage.

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## Iowa Electric Light and Power Company

August 11, 1982 LDR-82-222 50-331

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

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

Dear Mr. Denton:

The following information is provided in support of our request for extension of time on implementation of Interim Requirements Related to Hydrogen Control (10CFR50.44). Our request was by letter LDR-82-056 dated March 18, 1982.

An engineering estimate of the modifications required for compliance with the rule indicates the following:

| Activity             | Time required                |
|----------------------|------------------------------|
| Detailed design      | 35 weeks                     |
| Material delivery    | 65 weeks                     |
| Plant Modification   | 10 weeks (5 weeks in outage) |
| Recombiner Lead time | 22 months                    |

Considering overlap of some of the above activities, our estimate to provide the capability to install the recombiner is 18 months from start of work.

From the above information, it is not possible to implement this requirement during the DAEC 1983 refueling outage.

The cost for Iowa Electric Light and Power Company to make this modification is estimated to be \$1,672,000 not including the cost of the recombiner. This estimate is in contrast to the NRC estimated cost of approximately \$100,000.

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Mr. Harold Denton LDR-82-222 August 11, 1982 Page Two

We hope this information is of assistance in your decision regarding our request for extension of time. If we can be of further assistance, please advise us.

Very truly yours,

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/KAM/jlm\*

cc: K. Meyer

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Commitment Control Ref. 820071