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DENTON,H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards rev to 830415 response to Generic Ltr 82-33, clarifying commitments re planned refueling outages & adding mmilestones to Reg Guide 1.97 schedule.

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Iowa Electric Light and Power Company
July 29, 1983
NG-83-2609

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

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to Generic Letter 82-33
and NUREG-0737, Supplement 1
Reference: IEL&P Letter NG-83-1231, April 15, 1983

Dear Mr. Denton:

Your staff has requested that Iowa Electric clarify its commitments concerning Supplement 1 to NUREG-0737 by relating some commitment dates to our planned refueling outages. We are providing the requested clarification by revising Attachments A through E of our April 15, 1983 letter (reference). This letter transmits the revised attachments. The revisions are highlighted by vertical lines in the right margin of each attachment.

In addition to specifying some completion dates in terms of refueling outages, we have added additional milestones to the R.G. 1.97 schedule of Attachment C. We have also provided in Attachment C justification for the completion dates for these milestones.

The information in this letter and its attachments is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY Richard W McGaughy
Richard W. McGaughy
Manager, Nuclear Division

Subscribed and sworn to Before Me on this 29th day of July 1983.

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

RWM/SLS/rh*
Attachments: Attachment A (Rev. 1) SPDS
Attachment B (Rev. 1) DCRDR
Attachment C (Rev. 1) Reg. Guide 1.97
Attachment D (Rev. 1) EOP's
Attachment E (Rev. 1) ERF's

cc: S. Swails
L. Liu
S. Tuthill
F. Apicella
NRC Resident Inspector
Commitment Control No. 830001

A003
1/1

SPDS

Current Status:

Initial conceptual design and planning efforts have been completed providing the information necessary for key management decisions and for development of the data necessary for the selection of a number of potential vendors to develop the interim SPDS design. Selection of a vendor for the system is scheduled for July 1983 and installation is scheduled for the Fall 1984 refueling outage. It is planned to upgrade the SPDS as described in the cover letter (NG-83-1231) to further integrate the other ERC tasks as shown on our November 12, 1982 submittal.

Currently we are evaluating vendor bids for preliminary and final design.

SPDS Integrated Schedule:

The SPDS will be integrated with other elements of the ERC. The integration of ERC tasks is a continuous iterative process involving interchanges among tasks. These interchanges will be identified on the detailed schedules for each task and will continue until final completion of each task.

Submittal Date for Safety Analysis: December 1983

Submittal Date for Implementation Plan: December 1983

Operable Date: Sixty days after Cycle 8 start-up (February 1985, based on present refueling plans).

DCRDR

Current Status:

A DAEC Control Room Design Review has been conducted as part of the BWR Owner's Group Control Room Survey Program. Short-term and long-term control room enhancements were identified and described to the NRC by letter dated April 1, 1982 (L. D. Root to H. Denton).

The survey addressed a number of the DCRDR requirements of Supplement 1 to NUREG-0737. This included the assessment of Human Engineering Discrepancies (HED's) and identification of control room enhancements.

Program Plan Submittal Date: November 1984

The Program Plan will contain the remaining elements of the DAEC DCRDR. The supplemental DCRDR will assess the impact of the interim SPDS and the upgraded EOP's. The supplemental DCRDR is scheduled to be performed consistent with implementation of the interim SPDS and upgraded EOP's.

Summary Report Submittal Date: Six months after SPDS operable and training complete (August 1985, based on present refueling plans)

Reg. Guide 1.97

Current Status:

We have been addressing the guidance of Regulatory Guide 1.97 as part of our non-Supplement 1 modification efforts. For example, when an instrument must be changed or added to meet a NUREG-0737 or Environmental Qualification requirement, we assess the guidance of Regulatory Guide 1.97 in designing the new instrument.

Subsequent to our April 15, 1983 response, we have begun a study to determine the manner in which we plan to implement the guidance of R.G. 1.97. A report of the study will be provided according to the schedule below.

Submittal date for a report describing how the requirements of Supplement 1 to NUREG-0737 have been or will be met:

Prior to Cycle 8 start-up (December 1984, based on present refueling plans.)

Implementation of R.G. 1.97 guidance:

Schedule of implementation dates to be provided 90 days after Cycle 8 start-up (March 1985, based on present refueling plans).

Justification of Milestone Dates:

The milestone dates above were determined by our ERC integration process. Even though the first generation of upgraded EOP's will not depend on R.G. 1.97 instrumentation that is not installed, the process of developing the EOP's will identify our Type A variables for R. G. 1.97. The EOP development process will not be complete until just prior to Cycle 8 start-up. Therefore, the report describing how we plan to meet the Supplement 1 requirements for R.G. 1.97 cannot be provided until that time.

Once we have determined what R.G. 1.97 instrumentation to install, we can then begin the scheduling process. We estimate it will take 90 days from Cycle 8 start-up to provide an implementation schedule. We feel 90 days is the earliest we can provide a schedule because of staff workload due to the concurrently scheduled SPDS and DCRDR work. Additionally, we wish to use the results of our DCRDR as an input to our R.G. 1.97 instrumentation plans. Providing a schedule for R.G. 1.97 implementation any sooner would degrade the quality of the schedule and deny us the opportunity to integrate our post-accident instrumentation with our EOP's and DCRDR.

EOP's

Current Status:

We are in the process of writing a plant specific Writer's Guide (Procedures Generation Package). The Guide is undergoing its first revision at this time.

Submittal Date for Generic Technical Guidelines:

Iowa Electric is using the BWR Owners' Group Emergency Procedure Guidelines (Rev. 2) dated June 12, 1982 as a basis for development of the upgraded EOP's. These Emergency Procedure Guidelines were submitted to the NRC and the NRC has issued a SER dated February 4, 1983.

Submittal Date for Procedures Generation Package:

October 1983

Implementation Date for EOP's:

Prior to Cycle 8 startup (December 1984, based on present refueling plans).

Completion Date for Integrated Training Plan:

Iowa Electric is currently developing a Master Training Plan for all DAEC training. We intend to use the Master Training Plan to fulfill the Integrated Training Plan requirement. The Master Training Plan will be complete in July 1983. The specific details for the ERC items will not be included in the Master Training Plan at that time, but will be added on a task by task basis prior to performing the required training.

ERF's

Current Status:

The DAEC presently has a functional TSC, OSC, and EOF. We have long-term plans to upgrade these facilities and integrate them with the other ERC initiatives. This upgrade and integration will proceed in parallel with the implementation of the other ERC initiatives.

We are presently performing a study to assess our TSC, OSC, and EOF against the requirements of NUREG-0737, Supplement 1. The study is not complete; however, we believe that it will conclude that the OSC is fully functional and that the TSC and EOF will be fully functional when the readouts from the appropriate R.G. 1.97 instrumentation are installed. Therefore, the fully functional status of the TSC and EOF is dependent upon our R.G. 1.97 schedule.

Completion dates for:

Fully functional TSC:	Date to be provided 90 days after Cycle 8 start-up (March 1985, based on present refueling plans)
Fully functional OSC:	Complete
Fully functional EOF:	Date to be provided 90 days after Cycle 8 start-up (March 1985, based on present refueling plans)