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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow      05000331  
 AUTH. NAME: MCGAUGHY, R.W.      AUTHOR AFFILIATION: Iowa Electric Light & Power Co.  
 RECIP. NAME: DENTON, H.      RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Provides clarification of schedule for implementation of emergency response capability requirements, in view of Suppl 1 to NUREG-0737. Revised Schedule B encl.

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**Iowa Electric Light and Power Company**

September 9, 1983  
NG-83-3169

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  
Clarification of Schedule B With Respect to  
Emergency Response Capability Items

Dear Mr. Denton:

This letter provides clarification of the schedule for implementation of Emergency Response Capability (ERC) requirements at the Duane Arnold Energy Center (DAEC).

Schedule B as submitted with our November 12, 1982 request for a license amendment approving the "Plan for the Integrated Scheduling of Plant Modifications for the DAEC" (The Plan) included ERC items as then understood. Subsequently (January 17, 1983) we received Supplement 1 to NUREG-0737 (The Supplement) which revised ERC program descriptions and provided additional guidance concerning ERC requirements. We filed our responses to the Supplement on April 15, 1983 and on July 29, 1983, identifying dates for complying with the requirements which are consistent with the dates set out in Schedule B of November 12, 1982 as updated when the NRC issued Amendment 91 on May 3, 1983. However, the Schedule B listing of ERC items was not revised in May or July 1983 to include the additional detail provided in our responses to the Supplement.

Attachment 1 gives the revised description of each ERC item which was listed in the original Schedule B. Attachment 2 is an update of the ERC portion of Schedule B which sets out all ERC items in the same format as Schedule B and shows the additional milestones required by The Supplement. Attachment 2 will be included in our semi-annual update of Schedule B, as required by Section V.A. of the Plan.

We maintain our strong commitment to completion of work as identified in Schedule B and believe issuance of a confirmatory order with respect to ERC items is unnecessary.

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Mr. Harold Denton  
September 9, 1983  
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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 9th day of September 1983.

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

RWM/TGD/dmh\*

Attachments: 1) Revised Description of ERC Items  
2) Schedule B (ERC Items)

cc: T. Dalton  
L. Liu  
S. Tuthill  
F. Apicella  
NRC Resident Office  
Commitment Control

Original Description	Revised Description
SPDS	<p><u>SPDS</u></p> <ol style="list-style-type: none"> <li>1) Safety Analysis Submittal</li> <li>2) Implementation Plan Submittal</li> <li>3) Operable Date</li> </ol>
Detailed CRDR	<p><u>DCRDR</u></p> <ol style="list-style-type: none"> <li>1) Program Plan Submittal</li> <li>2) Supplemental DCRDR</li> <li>3) Summary Report Submittal</li> </ol>
SPDS Upgrade	<p><u>Reg. Guide 1.97</u></p> <ol style="list-style-type: none"> <li>1) Submit Report on Supplement 1 Requirements</li> <li>2) Submit Schedule of Implementation Dates</li> </ol>
I.C.1 EOP's	<p><u>EOP's</u></p> <ol style="list-style-type: none"> <li>1) Submit Procedures Generation Package</li> <li>2) Implementation</li> </ol>
<hr/>	<p><u>ERF</u></p> <ol style="list-style-type: none"> <li>1) Provide Date for Fully Functional TSC</li> <li>2) Fully Functional OSC</li> <li>3) Provide Date for Fully Functional EOF</li> </ol>

SCHEDULE B  
(ERC Items)

Attachment 2  
NG-83-3169  
September 9, 1983

SPDS

Safety Analysis Submittal  
Implementation Plan Submittal  
Operable Date\*

DCRDR

Program Plan Submittal  
Supplemental DCRDR\*  
Summary Report Submittal\*

Regulatory Guide 1.97

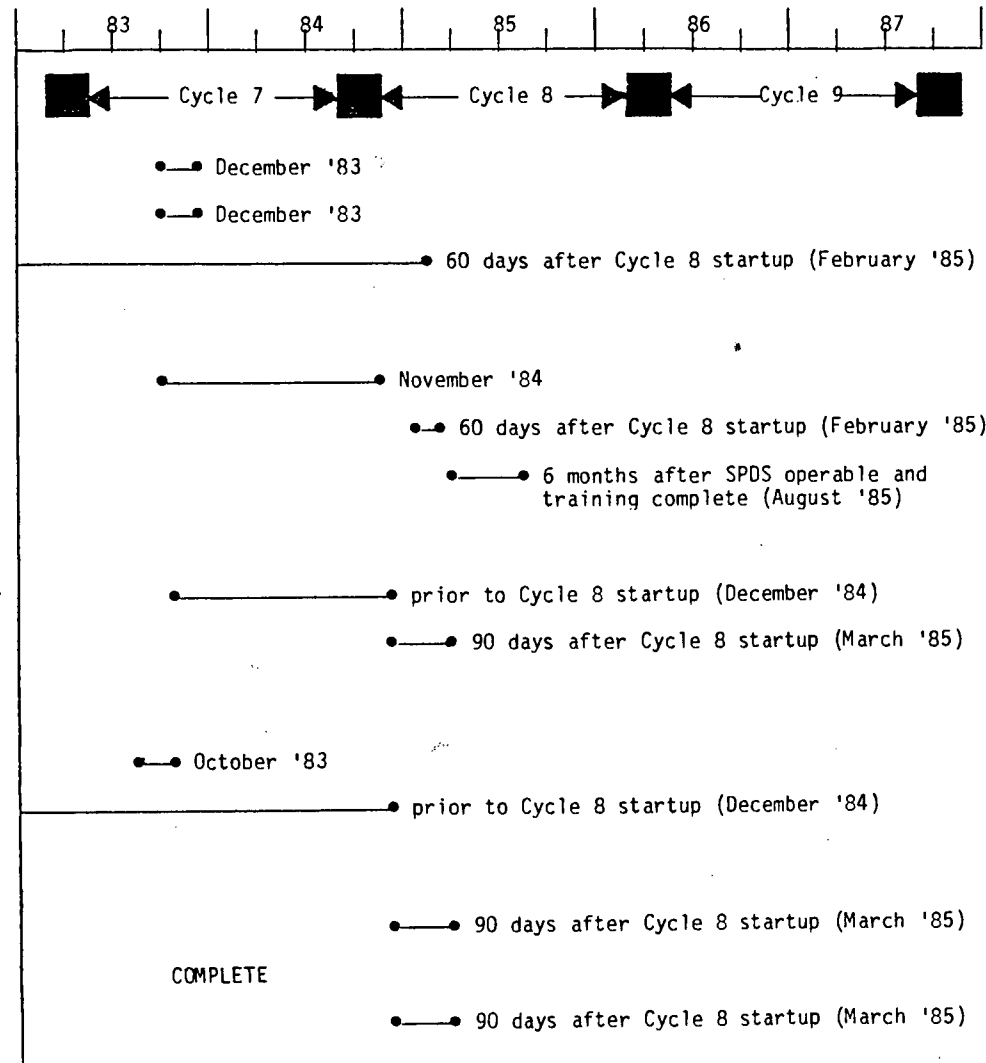
Submit Report on Supplement 1 Requirements\*  
Submit Schedule of Implementation Dates\*

EOP's

Submit Procedures Generation Package  
Implementation\*

ERF

Provide Date for Fully Functional TSC\*  
Fully Functional OSC  
Provide Date for Fully Functional EOF\*



\*Completion Date linked with End of Refueling  
Outage