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 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Requests extension of deadline for response to NRC Generic Ltr 89-04.

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Iowa Electric Light and Power Company

September 21, 1989

NG-89-2532

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Request for Extension of Deadline for NRC
Generic Letter 89-04 Response
File: A-101b, A-286e

Dear Dr. Murley:

NRC Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs" requires that, by October 3, 1989, we review our most-recently submitted Inservice Testing (IST) program and implementing procedures and either confirm that our program meets the guidelines of that letter or revise the program to be in conformance. The NRC also sponsored meetings to discuss the contents of the generic letter and provide further, more specific guidance to be used by licensees in the review of their IST Programs. Among the items discussed at these meetings was the appropriateness of the time period allowed by the NRC Staff. The Staff indicated that it will consider extending the October 3, 1989, deadline provided adequate justification is presented by a licensee.

We request that the deadline for review of the IST Program for the Duane Arnold Energy Center (DAEC) in accordance with Generic Letter 89-04 be extended to January 5, 1990. This extension is necessitated by the difficulties that we have encountered in obtaining outside expertise to assist in performing the required review. Work is now underway and we estimate we will have completed the review of our presently-docketed IST program, which is approximately 35% of the total project scope, by the October 3 deadline. We estimate that an additional 750 man-hours of work will be needed to complete and implement procedure revisions and to complete internal review of the program. We also anticipate the need for some minor program changes after the NRC publishes the guidance discussed at the aforementioned NRC-sponsored meetings. Therefore, we conclude the requested three-month extension is appropriate.

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Dr. Thomas E. Murley
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Should you have any questions concerning this submittal, please contact this office.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/NKP/pjv+

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