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 RECIPIENT AFFILIATION
 RECIP.NAME RECIPIENT AFFILIATION
 MURLEY,T.E. Office of Nuclear Reactor Regulation, Director (Post 870411 R

SUBJECT: Provides response to Generic Ltr 88-20, Suppl 4, "Individual Plant Exams of External Events Methods & Schedules." I

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Iowa Electric Light and Power Company
December 23, 1991
NG-91-4093

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
Response to Generic Letter 88-20,
Supplement 4
File: A-101b

Dear Dr. Murley:

Generic Letter (GL) 88-20, Supplement 4, requested that licensees submit proposed programs for completing individual plant examinations of external events (IPEEE) for plant-specific severe accident vulnerabilities. This letter and the attached methods and schedules provide Iowa Electric Light and Power Company's (IELP's) response to GL 88-20, Supplement 4, for the Duane Arnold Energy Center (DAEC).

IELP is committed to timely completion of the IPEEE. We recognize, however, that successful completion of the individual plant examination (IPE) for internal events is critical to achieving useful results from the IPEEE. Our IPE is scheduled for completion and submittal to the NRC in August 1992. Consequently, our schedules and major milestones for the IPEEE will be communicated to you in the November 1992 semi-annual update of our Integrated Plan.

Regarding the seismic portion of the IPEEE program, the DAEC is a USI A-46 plant and IELP is a member of the Seismic Qualification Utility Group (SQUG). Because of the similarities of the two programs, IELP intends to conduct common portions of the seismic IPEEE and A-46 program concurrently. However, the Supplemental Safety Evaluation Report (SSER) on the SQUG's Generic Implementation Procedure (GIP) for resolution of USI A-46 is not yet available and therefore we have not been able to finalize coordinated plans and schedules for the seismic portion of the IPEEE.

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Dr. Thomas E. Murley
December 23, 1991
NG-91-4093
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This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By *Daniel L. Mineck*
Daniel L. Mineck
Manager, Nuclear Division

State of Iowa

County of Linn

Signed and sworn to before me on this *23rd* day of
December, 1991, by *Daniel L. Mineck*

Kathleen M. Furman
Notary Public in and for the State
of Iowa
September 28, 1992
Commission Expires

DLM/LRH/pjv
Attachment

cc: L. Heckert
L. Liu
L. Root
R. McGaughy
C. Shiraki (NRC-NRR)
A. Bert Davis (NRC-Region III)
NRC Resident Office

IPEEE Methods and Schedules

SEISMIC EVENTS

The Duane Arnold Energy Center is classified by GL 88-20, Supplement 4 as "Reduced scope, deserving special attention to shallow soil conditions". The methodology we propose to utilize is the EPRI Seismic Margin Assessment consistent in scope with NUREG 1407, Section 3.2.5, with appropriate consideration of soil site vulnerabilities.

Because of the delay in issuance of the SSER on the SQUG's Generic Implementation Procedure, we are unable to submit a firm schedule to complete the seismic portion of the IPEEE. When the SSER is issued, we will review it and modify our program for conducting the seismic portion of IPEEE based on the content of the SSER and resolution of open issues.

INTERNAL FIRES

In 1991, we participated in a trial application of EPRI's "FIVE" methodology. This internal fire evaluation method will be utilized following completion of the IPE Internal Events which was identified as a necessary prerequisite.

We currently expect that we can complete this portion of the IPEEE within the 3 year time frame suggested in the GL. Major milestones and final schedules will be developed by the Fall of 1992 and communicated to you in our November 1992 update of the Integrated Plan.

HIGH WINDS AND TORNADOES, FLOODS, AND TRANSPORTATION AND NEARBY FACILITY ACCIDENTS

The screening approach identified in GL 88-20, Supplement 4, Section 4.3 and Figure 1 will be utilized.

We currently expect that we can complete this portion of the IPEEE within the 3 year time frame suggested in the GL. Major milestones and final schedules will be developed by the Fall of 1992 and communicated to you in our November 1992 update of the Integrated Plan.