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 FRANZ, J.F. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Documents items discussed in 920304 telcon re previously made commitments for specifically accounting for isotopic weights for Pu-241 in SNM program. Implementing commitment not prudent & could result in incorrect reporting.

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Iowa Electric Light and Power Company

April 30, 1992
NG-92-1887

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Modeling of In-Core Pu-241 Decay
File: J-80a

Dear Dr. Murley:

The purpose of this letter is to document the phone conversation of March 4, 1992 between representatives of the Nuclear Regulatory Commission (NRC) and Iowa Electric Light and Power Company (IELP) regarding previously made commitments for specifically accounting for isotopic weights for PU-241 in our Special Nuclear Material (SNM) Program.

In response to an IELP Quality Assurance Audit performed in 1989, a commitment was made internally to account for in-core Pu-241 decay when the reactor is shutdown and to account for any amounts of Pu-241 exceeding one gram in the reporting of special nuclear material isotopic weights to the Department of Energy. As this internal commitment affected our reporting of SNM to the NRC, we notified your staff of our intention in a teleconference on December 8, 1989. The staff did not have any concerns with our proposed plan, as this did not conflict with any regulatory requirements.

Originally, we thought that accounting for Pu-241 decay would involve a simple change in the programming of the DAEC Plant Process Computer (automated process) or periodically performing a minor change to the isotopic weights in the special nuclear materials data base (manual process). Further review of the programming modifications required to monitor automatically and account for Pu-241 decay has shown that these changes are more extensive than was anticipated when the original commitment was made. There is concern that performing these modifications in the computer programming may induce undetected errors into the current special nuclear materials accounting program. A manual process would involve performing a hand calculation to account for the Pu-241 decay and then changing the plant process computer data base manually to incorporate the new isotopic weights. There is also a concern that using a manual process will increase the potential for human error and could result in the incorrect reporting of special nuclear material isotopic weights. Consequently we have determined that implementing this commitment is not prudent and we will not be specifically tracking and reporting isotopic weights of PU-241 in our next SNM report.

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April 30, 1992
NG-92-1887
Page 2

This change of commitment was communicated with your staff in our teleconference on March 4, 1992. Again, as our current tracking and reporting requirements conforms to the regulatory requirements, your staff expressed no concerns with our change in plans.

Very truly yours,



John F. Franz, Jr.
Vice President, Nuclear Division

JFF/djm/jc+

cc: D. Mienke
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NRC Resident Office