



March 30, 2012

NG-12-0134
10 CFR 2.202

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

NEXTERA ENERGY DUANE ARNOLD, LLC'S ANSWER TO MARCH 12, 2012
COMMISSION ORDER MODIFYING LICENSE WITH REGARD TO
REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN
BASIS EXTERNAL EVENTS (ORDER NUMBER EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled "Order Modifying License with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Effective Immediately)" ("Order") to, *inter alia*, NextEra Energy Duane Arnold, LLC (hereafter NextEra Energy Duane Arnold). The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC has decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically with respect to this Order, the NRC is requiring additional defense-in-depth measures at licensed nuclear power reactors to address uncertainties associated with protection from beyond-design-basis external events. Licensees are specifically directed by the Order to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan, including a description of how compliance with the requirements described in Attachment 2 will be achieved, to the NRC for review by February 28, 2013. In addition, the

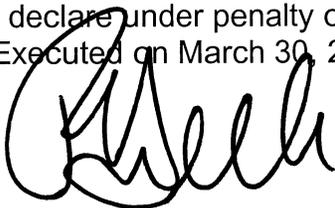
Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 CFR §2.202 and the terms specified in the Order, NextEra Energy Duane Arnold hereby submits its answer to the Order. NextEra Energy Duane Arnold consents to the Order and does not request a hearing. Based on information currently available, NextEra Energy Duane Arnold has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, NextEra Energy Duane Arnold has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever is earlier. NextEra Energy Duane Arnold will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of NextEra Energy Duane Arnold to comply with the specific compliance deadline dates based on the probable availability of that guidance, NextEra Energy Duane Arnold's future responses may include requests for schedule relief, as warranted by subsequent NRC requirements or implementing guidance, or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

This letter makes no new commitments or changes to any existing commitments.

If you have any questions or require additional information, please contact Ken Putnam at 319-851-7238.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on March 30, 2012

A handwritten signature in black ink, appearing to read 'Peter Wells', is written over the text of the declaration.

Peter Wells
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC