



June 25, 2013

NG-13-0269
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

Response to June 6, 2013 Commission Order Modifying License With Regard To
Reliable Hardened Containment Vents Capable Of Operation Under Severe
Accident Conditions (Order Number EA-13-109)

- References: 1) Order EA-13-109, "Order to Modify Licenses with Regard to
Reliable Hardened Containment Vents Capable of Operation
Under Severe Accident Conditions," dated June 6, 2013
(ML13143A321)
- 2) Order EA-12-050, "Order to Modify Licenses with Regard to
Reliable Hardened Containment Vents," dated March 12, 2012
(ML12054A694)
- 3) Letter, R. Anderson (NextEra Energy Duane Arnold, LLC) to
U. S. NRC, "NextEra Energy Duane Arnold, LLC's Overall
Integrated Plan in Response to March 12, 2012 Commission
Order Modifying Licenses with Regard to Reliable Hardened
Containment Vents (Order Number EA-12-050)," NG-13-0085,
dated February 28, 2013 (ML13063A019)

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees that operate boiling-water reactors (BWRs) with Mark I and Mark II containment designs, including NextEra Energy Duane Arnold, LLC (hereafter NextEra Energy Duane Arnold), entitled "Order Modifying License with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Effective Immediately)." Order EA-13-109 rescinds Reference 2, an Order issued by the NRC on March 12, 2012 (EA-12-050), that required all BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of a reliable hardened vent system to remove decay heat and maintain control of containment pressure following events that result in loss of active containment heat removal capability or prolonged loss of AC power.

ADD
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Order EA-13-109 requires NextEra Energy Duane Arnold to install hardened containment venting systems that can be maintained functional during severe accident conditions, i.e. following significant core damage. The substantive requirements of the Order are contained in Attachment 2 of Reference 1. The Order includes two separate implementation phases. Phase 1 includes modifications to wetwell venting systems, while Phase 2 includes modifications to drywell venting systems or implementation of a reliable containment strategy that meets regulatory approval. NextEra Energy Duane Arnold is required to submit an overall integrated plan describing how compliance with Phase 1 will be achieved to the NRC by June 30, 2014, and is required to complete full implementation of Phase 1 requirements no later than startup from the second refueling outage that begins after June 30, 2014, or June 30, 2018, whichever is sooner. EA-13-109 also requires NextEra Energy Duane Arnold to submit an overall integrated plan describing how compliance with Phase 2 will be achieved to the NRC by December 31, 2015, and full implementation of Phase 2 requirements must be complete no later than startup from the first refueling outage that begins after June 30, 2017, or June 30, 2019, whichever is sooner.

The NRC states in the Order that it anticipates issuing implementation guidance for Phase 1 by October 31, 2013, and for Phase 2 by April 30, 2015. Upon issuance of the implementation guidance, NextEra Energy Duane Arnold understands that we will have twenty days to assess the impact of the guidance and notify the NRC of any challenges with implementation of the Order in accordance with Paragraph IV.C of the Order.

Pursuant to 10 C.F.R. § 2.202(a)(2), NextEra Energy Duane Arnold hereby submits its answer to the Order. NextEra Energy Duane Arnold consents to Order EA-13-109 and does not request a hearing. However, because implementing guidance is not expected to be available until October 31, 2013, for Phase 1 and April 30, 2015, for Phase 2, there remain significant uncertainties about the scope of the work that will be required by EA-13-109. As a result, NextEra Energy Duane Arnold is unable to state with certainty that it will be able to meet all of the specified compliance deadlines in the Order. As such, 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.

Because EA-12-050 is rescinded by EA-13-109, NextEra Energy Duane Arnold understands that all implementation deadlines and submittal requirements for EA-12-050 are no longer in force. As such, NextEra Energy Duane Arnold considers the integrated plan that was submitted to the NRC on February 28, 2013 (Reference 3) to be withdrawn, and no further action is required by NextEra Energy Duane Arnold with respect to that submittal or any other requirement specific to EA-12-050.

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

I declare under penalty of perjury that the foregoing is true and correct.
Executed on June 25, 2013



Richard L. Anderson
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

cc: Regional Administrator, USNRC, Region III
Resident Inspector, USNRC, Duane Arnold Energy Center
Project Manager, USNRC, Duane Arnold Energy Center