



December 9, 2014

NG-14-0288  
10 CFR 50.73

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

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

Licensee Event Report #2014-006

Please find attached the subject report submitted in accordance with 10 CFR 50.73. This letter makes no new commitments or changes to any existing commitments.

A handwritten signature in black ink, appearing to be "T. A. Vehec".

T. A. Vehec  
Vice President, Duane Arnold Energy Center  
NextEra Energy Duane Arnold, LLC

cc: Administrator, Region III, USNRC  
Project Manager, DAEC, USNRC  
Resident Inspector, DAEC, USNRC

Handwritten initials in black ink, reading "IE22" on the top line and "NRR" on the bottom line.



**LICENSEE EVENT REPORT (LER)**

(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

<b>1. FACILITY NAME</b> Duane Arnold Energy Center	<b>2. DOCKET NUMBER</b> 05000-331	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 2

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	12	2014	2014	006	00	12	9	2014	N/A	N/A
									N/A	N/A

**9. OPERATING MODE**      **11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)**

5	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
10. POWER LEVEL  0%	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

**12. LICENSEE CONTACT FOR THIS LER**

<b>LICENSEE CONTACT</b> Jim Probst, Licensing Engineer	<b>TELEPHONE NUMBER (Include Area Code)</b> (319) 851-7308
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b> MONTH:      DAY:      YEAR:
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**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)**

On October 12, 2014, while in Mode 5 for a refueling outage and prior to commencing certain planned activities, Duane Arnold Energy Center (DAEC) implemented the guidance of NRC EGM 11-003, R2, "Enforcement Guidance Memorandum 11-003, Revision 2, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel" (OPDRV). Throughout the planned OPDRV activities that continued, DAEC implemented interim actions per EGM 11-003 as an alternative to maintaining Secondary Containment operability as required by Technical Specification (TS) 3.6.4.1. While the NRC's enforcement guidance provides allowance for these actions, the OPDRV activities without Secondary Containment are still considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a Condition Prohibited by Technical Specifications. The implementation of EGM 11-003, Revision 2 was a planned activity and did not require a cause evaluation. Consistent with the guidance in the EGM, Duane Arnold Energy Center will submit a license amendment request (LAR) within twelve months after issuance of a notice of availability regarding a generic resolution of the issues surrounding the need for the EGM.



**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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**NARRATIVE**

**I. Description of Event:**

On October 12, 2014, while in Mode 5 for a refueling outage (RFO 24), Duane Arnold Energy Center (DAEC) implemented the guidance of NRC EGM 11-003, Revision 2, "Enforcement Guidance Memorandum 11-003, Revision 2, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel." This was prior to beginning a series of planned maintenance activities replacing four Local Power Range Monitors (LPRMs) which provide input on reactor core power to the control room and plant safety systems. Each of these actions was considered an Operation with a Potential for Draining the Reactor Vessel (OPDRV) due to the need to access the vessel interior via inlets on the bottom of the vessel.

Plant Technical Specification 3.6.4.1 requires Secondary Containment operability while in Mode 5 with OPDRV actions in progress. As an alternative, the NRC has issued EGM 11-003, Revision 2, which provides generic enforcement discretion following implementation of specific interim actions as an alternative to full compliance with this technical specification. These interim actions require water level in the reactor vessel to be of sufficient depth to ensure that a vessel drainage event related to the OPDRV activities will not result in insufficient inventory for at least twenty four hours, assuming no compensatory actions are taken. In addition, the EGM interim actions require the capability of isolating the OPDRV leakage path (through valve closure, etc.). Also required is the availability of a safety-related pump with an extensive makeup water source, and multiple independent means of determining water level in the reactor vessel.

On October 12, components providing Secondary Containment at DAEC were not functional while undergoing scheduled maintenance. As planned, prior to commencing OPDRV activities for LPRM replacement, plant personnel confirmed and documented that the interim conditions and actions required by EGM 11-003 were in place. Beginning on October 12, 2014 at 1500, NRC Enforcement Guidance Memorandum (EGM) 11-003, Revision 2 for the performance of OPDRVs was invoked. LPRM replacements were completed at 0320 on October 13, 2014. Secondary Containment was successfully restored to operability on October 13, 2014 at 1805, at which time EGM 11-003 Revision 2 was no longer invoked.

**II. Assessment of Safety Consequences:**

The safety significance of this activity was minimal. As discussed in EGM 11-003, Revision 2, enforcement discretion related to Secondary Containment operability during Mode 5 OPDRV activities is appropriate because the interim actions necessary to receive the discretion ensure an adequate level of safety.

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**NARRATIVE**

**III. Cause of Event:**

The use of EGM 11-003, Revision 2 interim actions during the plant outage while in Mode 5 was a planned activity. As such, no cause determination was necessary.

**IV. Corrective Actions:**

Consistent with the guidance in the EGM, Duane Arnold Energy Center will submit a license amendment request (LAR) within twelve months after issuance of a notice of availability regarding a generic resolution of the issues surrounding the need for the EGM. This action is being tracked in the corrective action program.

**V. Additional Information:**

Previous Similar Occurrences:

A review of DAEC Licensee Event Reports found no other instances of DAEC invoking EGM 11-003, which was first issued in 2011.

EIIS System and Component Codes:

n/a

Reporting Requirements:

This activity is being reported per 10 CFR 50.73(a)(2)(i)(B) as a Condition Prohibited By Technical Specifications.