



December 15, 2017

NG-17-0235  
10 CFR 50.90  
10 CFR 50, Appendix E

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

Duane Arnold Energy Center  
Docket No. 50-331

License Amendment Request TSCR-166, Adoption of Emergency Action Level Scheme Pursuant to NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors"

In accordance with 10 CFR 50.90, NextEra Energy Duane Arnold, LLC, (NextEra) hereby requests an amendment to the Duane Arnold Energy Center (DAEC) Emergency Plan. The proposed change involves revising the Emergency Plan for DAEC to adopt the Nuclear Energy Institute's (NEI's) revised Emergency Action Level (EAL) scheme described in NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," which has been endorsed by the NRC.

10 CFR 50, Appendix E, Section IV.B.2 stipulates that a licensee desiring to change its entire EAL scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change.

The Enclosure to this letter provides NextEra's evaluation of the proposed change. The following information is included as Attachments to the Enclosure to aid NRC review and approval:

- Attachment 1 - Redline Markup of NEI 99-01 Revision 6
- Attachment 2 - Clean Copy of the Proposed DAEC EAL Scheme
- Attachment 3 - Deviations and Differences Matrix
- Attachment 4 - Supporting Technical Information
- Attachment 5 - DAEC EAL Scheme Wallboards

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As presented in the evaluation, the proposed change does not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change. This change has been reviewed and concurred with by the Duane Arnold Onsite Review Group.

In accordance with 10 CFR 50.91, a copy of this letter is being forwarded to the State of Iowa designee.

This letter contains no new or revised regulatory commitments.

NextEra requests approval of the amendment by December 1, 2018 with a targeted implementation period of 365 days to allow consideration of outage schedules and required training cycles.

Should you have any questions regarding this submittal, please contact Michael Davis, Licensing Manager, at 319-851-7032.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 15, 2017

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Curtland". The signature is fluid and cursive, with a large loop at the end.

Dean Curtland  
Site Director, Duane Arnold Energy Center  
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Administrator, Region III, USNRC  
Project Manager, USNRC, Duane Arnold Energy Center  
Resident Inspector, USNRC, Duane Arnold Energy Center  
State of Iowa