

Iowa Electric Light and Power Company

JOHN F. FRANZ, JR.
VET. PRESIDENT, NUCLEAR

December 15, 1994
NG-93-5270

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Endorsement of NRC Reg. Guide 8.38 for
Spent Fuel Pool Rerack Operations
Reference: RTS-252, Letter, J. Franz (IELP) to Dr.
Murley (NRC), dated March 26, 1993, NG-
93-0566
File: A-117, J-82d

Dear Dr. Murley:

This letter is in response to a verbal request made by members of your staff. We are modifying our previous commitment to follow draft Regulatory Guide DG-8006 for any diving activities during reracking of the Duane Arnold Energy Center (DAEC) Spent Fuel Pool, as stated in Reference 1. We have reviewed the recently issued Regulatory Guide 8.38, which replaces DG-8006, and concluded that our procedures and those of our contractor conform to that Regulatory Guide.

As requested by members of your staff, we hereby modify our commitment to DG-8006 by replacing it with a commitment to meet Regulatory Guide 8.38, dated June, 1993, for any diving operations in support of reracking the Spent Fuel Pool.

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Should you have any additional questions regarding this matter,
please contact this office.

This letter is true and accurate to the best of my knowledge and
belief.

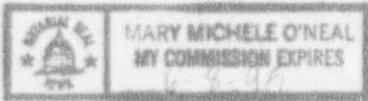
IOWA ELECTRIC LIGHT AND POWER COMPANY

By John F. Franz
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 15th day of
December, 1993, by John F. Franz.

Mary Michele O'Neal
Notary Public in and for the State of Iowa



June 8, 1995
Commission Expires

JFF/SRC:so
cc: S. Catron
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
J. Martin (Region III)
S. Brown (State of Iowa)
NRC Resident Office
DCRC