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IES Utilities Inc.  
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Telephone 319 398 4411

September 15, 1995  
NEP 95-0184

Mr. William T. Russell, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station PI-37  
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center  
Docket No.: 50-331  
Op. License No.: DPR-49  
Proposed Revision to Emergency Action Levels  
File: A-221

Dear Mr. Russell:

In accordance with the provisions of 10 CFR 50.54(q) and 10 CFR 50.4, IES Utilities Inc. hereby requests review and approval of the enclosed revisions to the Duane Arnold Energy Center (DAEC) Emergency Plan. These changes incorporate the guidance provided in NUMARC/NESP-007, Rev. 2, Methodology for Development of Emergency Action Levels (EALs). Please find enclosed:

1. The proposed revisions to the EAL tables to be incorporated into the DAEC Emergency Plan.
2. The DAEC EAL Technical Basis Document that describes how the DAEC-specific EALs were developed using the NUMARC/NESP methodology.
3. Letters of agreement from State and local authorities concerning the use of the new EALs obtained in accordance with 10 CFR 50, Appendix E.
4. An informational copy of DAEC's flow chart Emergency Operating Procedures and selected Abnormal Operating Procedures (AOPs) relating to loss of AC power, loss of DC power, loss of shutdown cooling, and loss of annunciators. The basis for the EALs is closely tied to these procedures; therefore, they are included to facilitate your review.

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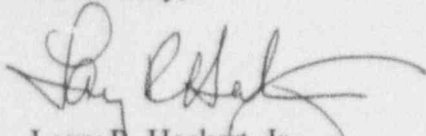
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We have closely followed the NUMARC methodology in the development of DAEC-specific EALs. As shown in the EAL Technical Basis Document, the deviations from the NUMARC guidance are minor. These differences are based on plant design features (e.g., primary system leakage), changes made to 10 CFR 20 since the NUMARC guidance was developed, plant procedure requirements, or based on clarifying information from the NUMARC Methodology for Development of Emergency Action Levels NUMARC/NESP-007, Revision 2, Questions and Answers document dated June, 1993. As appropriate, the approaches used by other plants that have been previously reviewed and approved were followed.

It is our intent to implement these changes by June 1, 1996. To support this goal, we request approval be granted by January 31, 1996. Please contact Larry Heckert at (319) 398-4286 should you require any additional information.

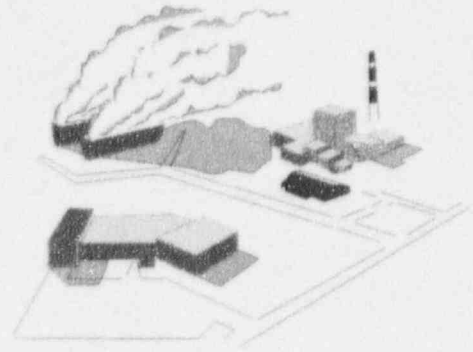
This letter makes no new commitments.

Yours truly,



Larry R. Heckert, Jr.  
Manager, Emergency Planning

Attachment  
LRH/CPT/ch



# *Duane Arnold Energy Center*

## **Technical Basis Document**

