

IES UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear

NG-94-3564
October 28, 1994

Mr. William T. Russeli, 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
Request for Operating License Amendment (RTS-272):
Deletion of the "Plan for the Integrated Scheduling of Plant
Modifications for the Duane Arnold Energy Center"
Reference: 1) Operating License Amendment No. 91, dated
May 3, 1983
File: A-117

Dear Mr. Russell:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, IES Utilities Inc. hereby requests revision of Operating License DPR-49 for the Duane Arnold Energy Center (DAEC).

The "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the Plan) was added as a condition of the license via Reference 1 and subsequently extended via Amendment Nos. 125, 148, 161 and 177. The original objective of the Plan was to enable the utility to better control and manage resources regarding major activities at the DAEC. Since that time, numerous changes have occurred which better enable the DAEC staff to manage these activities, as discussed in Attachment 1. As a result, IES Utilities Inc. requests to delete this condition from the license. The normal internal processes will continue to be used in managing these activities. IES Utilities Inc. will continue to maintain an open line of communications with the NRC on these issues.

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Mr. William T. Russell
NG-94-3564
October 28, 1994
Page 2

This application has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. A copy of this submittal, along with the no significant hazards considerations analysis, is being forwarded to our appointed state official pursuant to 10 CFR 50.91.

No new commitments are made by this letter.

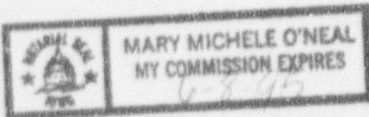
Should you have any questions regarding this matter, please contact this office.

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

IES Utilities Inc.
By John F. Franz
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 27th day of October, 1994,
by John F. Franz



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

June 8, 1995
Commission Expires

JFF/TWP/pjv
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- Attachments: 1) Evaluation of Change With Respect to 10 CFR 50.92
2) Proposed Change RTS-272 to the Duane Arnold Energy Center Operating License
3) Safety Assessment
4) Environmental Consideration

cc: T. Page
L. Liu
L. Root
A. Hsia (NRC-NRR)
J. Martin (Region III)
S. Brown (State of IA)
NRC Resident Office
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EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92Background:

The "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the Plan) was added as a condition of the license via Operating License Amendment No. 91. The original objective of the Plan was to enable the utility to better control and manage available resources and to perform required activities in a manner which would enhance plant safety by (1) improving control of safety related modifications and (2) more promptly implementing these modifications.

Since the inception of the Plan, the number of major projects has decreased significantly. Additionally, the methods of managing these projects have changed. Many of the projects in the Plan are already covered by separate correspondence to the NRC. There is redundancy in the tracking of these items between our commitment control system and the Plan. Organizational changes have resulted in the formation of an outage group, a project engineering group, and a priority review board, all of which deal with work planning and prioritization.

These internal processes continue to be used effectively in controlling and managing work activities at the DAEC. As a result, the Plan is no longer needed to assure these objectives.

IES Utilities Inc., Docket No. 50-331,
Duane Arnold Energy Center, Linn County, Iowa
Date of Amendment Request: October 28, 1994

Description of Amendment Request:

The proposed License Amendment would delete the "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" as a condition of the license.

Basis for proposed no significant hazards consideration:

The Commission has provided standards (10 CFR 50.92(c)) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

In reviewing this proposed request for License Amendment, we have concluded:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. No physical changes to the facility will occur as a result of this amendment. Work activities will continue to receive the appropriate level of review in accordance with DAEC procedures and practices. The organizational structure that controls and manages these activities remains unchanged and will assure that activities are prioritized and performed in a manner consistent with plant safety. The proposed amendment removes an administrative burden that is no longer required.
2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. No changes to the physical design and/or operation of the plant will occur as a result of this amendment. The processes by which activities are planned, prioritized, and controlled are not affected. The appropriate level of technical review and management oversight continue to be performed in accordance with existing procedures and practices to assure that activities are performed in a manner consistent with plant safety.
3. The proposed amendment does not involve a significant reduction in a margin of safety. As stated earlier, no changes to the physical design and/or operation of any plant systems will occur as a result of this amendment. Work activities will continue to receive the appropriate technical review and management oversight to assure that activities are prioritized and performed in a manner consistent with plant safety. The amendment removes an administrative burden that is no longer required.

Based on the above, we have determined that the proposed amendment will not involve a significant hazards consideration.

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401

Attorney for Licensee: Jack Newman, Kathleen H. Shea, Newman, Bouknight & Edgar, P.C., 1615 L Street NW, Washington, D.C. 20036-5610

PROPOSED CHANGE RTS-272 TO THE DUANE ARNOLD ENERGY CENTER
OPERATING LICENSE

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend said license by revising the attached page as indicated below.

Affected Page

Page 5 of the Operating License

Summary of Changes:

The following is a description of the proposed amendment.

Page

Description of Change

5

Delete the "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the Plan) as a condition of the license.