## IES UTILITIES INC.

John F. Franz, Jr. Vice President, Nuclear December 19, 1994 NG-94-4485

Mr. William T. Russell, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Stop P1-37 Washington, DC 20555-0001

Subject: Duane Arnold Energy Center (DAEC)

Docket No: 50-331 Op. License No: DPR-49

IES Utilities' Intent to Convert the DAEC

Technical Specifications to the Standard Technical

Specifications (NUREG-1433)

References: 1) J. Franz (IELP) to Dr. T. Murley (NRC),

"Request for Technical Specification Change (RTS-249): Addition of Technical Specifications 3.0 and 4.0 and Bases," NG-92-5179, December

31, 1992.

2) J. Franz (IES) to W. Russell (NRC),

"Semiannual Report for the 'Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center," NG-94-3658, November

1, 1994.

File: A-117, A-278

## Dear Mr. Russell:

The purpose of this letter is to notify you of our intent to convert the DAEC Technical Specifications (TS) to the new Standard TS (STS) - NUREG-1433. This conversion is a part of our continuing program to improve the quality of the DAEC TS, which has resulted in substantial short-term improvements. Our current target schedule is to begin the development of our application for the new TS in June 1995, after the Cycle 14 Refuel Outage (RFO13). The application would be submitted to the NRC in mid-1996. We will request that NRC review be completed so that the STS can be implemented in summer 1997, prior to the Cycle 16 Refuel Outage (RFO15). We have begun discussions with your Staff regarding this schedule.

In Reference 1, we submitted a request for a TS change to add the generic Limiting Conditions for Operation (LCO) and Surveillance Requirements (SR), *i.e.*, STS 3.0/4.0, to the existing DAEC TS. We now withdraw that request because those changes will be part of the conversion

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to the STS. It is no longer practical to pursue this TS change separately in view of the resources which would be required to process it.

In Reference 2 (item B-34), we informed you of an IES-initiative to reconstitute the design basis for the TS instrument setpoints. Because the STS revises many surveillance frequencies that, in turn, affect the calculated instrument setpoints, we believe it is prudent to revise our schedule for the Instrument Setpoint Program to coincide with that for the STS conversion due to the synergy between these two programs.

The following new commitment is being made in this letter:

Convert the DAEC TS to the STS (NUREG-1433). (Final Schedule to be mutually agreed upon with the NRC Staff.)

The following existing IES-initiative item is being withdrawn from the Integrated Plan in this letter:

Complete the Instrument Setpoint Program (Item # B34) by June 1, 1995.

And, as stated earlier, we hereby withdraw the request for TS change made in Reference 1.

By

Please contact this office if you have any questions on these matters.

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

IES UTILITIES INC

John F. Franz

Vice President, Nuclear

State of Iowa (County) of Linn

Signed and sworn to before me on this 20th day of December, 1994,

by John F. Franz

MARY MICHELE O'NEAL MY COMMISSION EXPIRES

Notary Public in and for the State of Iowa

Commission Expires

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cc: R. Browning

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