## IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office CEDAR RAPIDS. IOWA June 3, 1976 IE-76-853

LEE LU VICE PRESIDENT - ENGINEERING

## 50-331

Mr. George Lear, Chief Operating Reactors Branch 3 Division of Operating Reactors Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Lear:

Section V.B of Appendix I to 10CFR Part 50 requires Iowa Electric to file with the Commission:

- Such information as is necessary to evaluate the means employed for keeping levels of radioactivity in effluents to unrestricted areas as low as reasonably achievable, including all such information as is required by Paragraphs 50.34a(b) and (c) not already contained in our application and
- Plans and proposed Technical Specifications developed for the purpose of keeping releases of radioactive materials in unrestricted preas during normal reactor operations including expected operational occurrences as low as reasonably achievable.

Transmitted herewith is an evaluation (Attachment A) fulfilling the requirements of Itam 1, above.

Iowa Electric's proposed Technical Specifications are as presently contained in Appendix B to the Operating License Sections 2.3, 3.3 and 4.3.

Technical Specifications presently in effect are clearly more conservative than those necessary to meet the as low as reasonably achievable requirement. Iowa Electric presently contemplates revising these proposed Technical Specifications approximately two months after issuance of final staff guidance for Technical Specifications in accordance with Appendix I.

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Mr. George Lear, Chief Operating Reactors Branch 3 Division of Operating Reactors Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Lear:

Section V.B of Appendix I to 10CFR Part 50 requires Iowa Electric to file with the Commission:

- Such information as is necessary to evaluate the means employed for keeping levels of radioactivity in effluents to unrestricted areas as low as reasonably achievable, including all such information as is required by Paragraphs 50.34a(b) and (c) not already contained in our application and
- 2. Plans and proposed Technical Specifications developed for the purpose of keeping releases of radioactive materials in unrestricted areas during normal reactor operations Sociuding expected operational occurrences as low as reasonably achievable.

Transmitted herewith is an evaluation (Attachment A) fulfilling the requirements of Item 1, above.

Iowa Electric's proposed Technical Specifications are as presently contained in Appendix 8 to the Operating License Sections 2.3, 3.3 and 4.3.

Technical Specifications presently in effect are clearly more conservative than those necessary to meet the as low as reasonably a nievable requirement. Iowa Electric presently contemplates revising these proposed Technical Specifications approximately two months after issuance of final staff guidance for Technical Specifications in accordance with Appendix I. Mr. George Lear IE-76-853 Page 2

The evaluation attached demonstrates that the presently installed equipment (less the evaporator) meets Appendix I numerical guidelines for keeping levels of radioactivity in effluents to unrestricted areas as low as reasonably achievable and that additional equipment (including the evaporator) is not advantageous when considered in accordance with the cost benefit criteria of Regulatory Guide 1.110.

Three originals and 37 copies of this submittal are transmitted herewith. This submittal consisting of this letter and the attachment hereto, is true and accurate to the best of my knowledge and belief.

Iowa Electric Light and Power Company

Bv Lee Liu

Vice President, Engineering

LL/KAM/ms

cc: K. Meyer D. Arnold J. Newman L. Root J. Shea (NRC) J. Keppler (NRC) File A-107 File A-117 Sworn and Subscribed to before me on this 300 day of June, 1976.

Notary Public in and for the State of Iowa.

STATE OF IOWA Commission Expline September 30, 1773

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