

**From:** Wall, Scott  
**Sent:** Monday, August 3, 2020 4:34 PM  
**To:** Davis, J.Michael  
**Cc:** Laura Swenzinski (Laura.Swenzinski@nexteraenergy.com)  
**Subject:** Duane Arnold Energy Center – Acceptance of Requested Licensing Action, Proposed Exemptions from 10 CFR 140.11(a)(4) - Primary and Secondary Liability Insurance (EPID No. L-2020-LLE-0115)

Dear Mr. Davis:

By letter dated July 16, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20198M584), NextEra Energy Duane Arnold, LLC (NEDA, the licensee) submitted an exemption request for Duane Arnold Energy Center (DAEC). NEDA is requesting an exemption to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 140, Section 11(a)(4) for DAEC that would reduce the required level of primary off-site liability insurance from \$450,000,000 to \$100,000,000 and eliminate the requirement for DAEC to carry secondary financial protection. The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this exemption request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed exemption in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately **100 hours** to complete. The NRC staff expects to complete this review in approximately by **July 2021**. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-2855 or e-mail at [Scott.Wall@nrc.gov](mailto:Scott.Wall@nrc.gov).

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**From:** Wall, Scott

**Created By:** Scott.Wall@nrc.gov

**Recipients:**

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