

DOCKET NUMBER

PETITION RULE PRM 50-55
(55 FR 18608)

25

DOCKETED
USNRC

Iowa Electric Light and Power Company

July 2, 1990
NG-90-1446

90 JUL 10 A8:34

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk, Secretary
Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attention: Docketing Services Branch
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Comments on Petition for Rulemaking Regarding
Final Safety Analysis Report Revisions

References: (1) 55 Federal Register 18608 dated May 3, 1990
(2) Letter from J. F. Colvin (NUMARC) to S. J.
Chilk (NRC) dated July 2, 1990

File: A-116, A-119

Dear Mr. Chilk:

In Reference 1, the Nuclear Regulatory Commission published notice of receipt of a petition for rulemaking filed by the Yankee Atomic Electric Company regarding the schedule for submittals of revision to the Final Safety Analysis Reports (FSARs). In its petition, Yankee Atomic requested that the NRC amend 10CFR50.71(e)(4) to change the requirement that nuclear power plant licensees file revisions to their FSARs no less frequently than annually. The proposed alternative would require FSAR revisions to be filed within six months after the completion of a planned refueling outage. This letter responds to the NRC's request for comments on the petition for rulemaking.

The Nuclear Management and Resources Council (NUMARC) submitted their comments on the petition for rulemaking (Reference 2) supporting the Yankee Atomic petition. NUMARC concluded that the proposed alternative requirements would benefit the industry by reducing administrative costs associated with preparation of FSAR revisions, reducing the administrative burden on the NRC staff and enhancing the quality and accuracy of information contained in a licensee's FSAR. We fully endorse these comments.

We recognize the benefits of periodically revising our FSAR. However, requiring submittal of revisions within six months following completion of a planned refueling outage instead of annually would allow for more timely updating of the information contained in our FSAR. For example, major plant modifications

9007170039 900702
PDR PRM
XX-XX

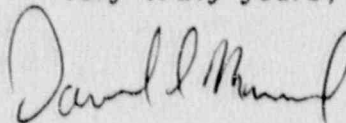
PDR

Mr. Samuel J. Chilk
July 2, 1990
NG-90-1446
Page Two

are normally installed during planned refueling outages and accident analyses are changed as a result of new fuel reloads. These changes could result in our FSAR being outdated for more than one year under the present requirements, whereas under the proposed alternative schedule, our FSAR would be updated to reflect these changes within six months. This proposed change would result in an estimated savings of \$500,000 over the remaining life of the plant. We also believe the proposed alternative would reduce our administrative burden as well as that of the NRC staff without compromising the health and safety of the public.

We appreciate the opportunity to comment on this petition for rulemaking and would be pleased to further discuss our comments with you.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/NKP:DMB*

cc: N. Peterson
L. Liu
L. Root
R. McGaughy
Commitment Control No. 900159