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April 19, 1996
NG-96-0912

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
UFSAR Improvement Plan

File: A-100, A-116

Dear Sirs:

In conjunction with the NRC Project Manager for the Duane Arnold Energy Center (DAEC), during his site visit on February 28-29, 1996, we identified several inconsistencies and inaccuracies in our Updated Final Safety Analysis Report (UFSAR) that require resolution. These issues pertain to our current refueling practices and the Spent Fuel Pool Cooling System as documented in our UFSAR.

Our current refueling practices and our Spent Fuel Pool Cooling System capabilities are documented in the submittals which supported our application for Operating License Amendment 195. These documents bound our current practices and demonstrate that we are operating within the capacity of our Spent Fuel Pool Cooling System. However, our UFSAR does not contain the thermal-hydraulic details and analysis contained in these documents. UFSAR Section 9.1 generally reflects the NUREG-0800 Standard Review Plan (SRP) and therefore is historically accurate but the extensive analysis performed to support our application for Amendment 195 is absent.

The purpose of this letter is to document our intention to resolve the inconsistencies and inaccuracies described above by revising UFSAR Section 9.1 to more clearly reflect current refueling practices analyzed and licensed in Amendment 195. We also intend to revise our operating procedures, as necessary, to reflect the requirements of the revised UFSAR Section 9.1. The revision to UFSAR Section 9.1 will be processed by

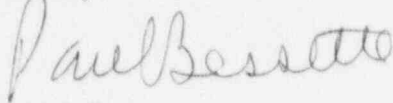
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September 1, 1996 and will be formally distributed with the next scheduled update of the UFSAR, currently scheduled for May, 1997. The revisions to the operating procedures will be completed before the start of Refuel Outage 14, currently scheduled for October, 1996.

Should you have any questions regarding this submittal, please contact me at (319) 851-7307.

Sincerely,



Paul M. Bessette,
Manager, Nuclear Licensing

PMB/LBS

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