



LA CROSSE BOILING WATER REACTOR (LACBWR) • P.O. BOX 275
GENOA, WISCONSIN 54632 • (608) 689-2331

May 9, 1985

In reply, please
refer to LAC-10849

DOCKET NO. 50-409

Director of Nuclear Reactor Regulation
ATTN: Mr. John Zwolinski, Chief
Operating Reactors Branch #5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR (LACBWR)
PROVISIONAL OPERATING LICENSE NO. DPR-45
RESPONSE TO GENERIC LETTER 85-07

Reference: (1) Letter to All Operating Reactor Licensees from
Hugh L. Thompson, Jr., Director, Division of Licensing,
dated May 2, 1985

Dear Sir:

Your letter (Reference 1) requesting our position on implementation of an integrated scheduling for plant modifications has been reviewed. The following are the responses we would make to your enclosure 2 which outlines our position on integrated scheduling.

I. INTENTIONS

The LaCrosse Boiling Water Reactor has had an integrated scheduling in place with the Nuclear Regulatory Commission for a number of years. While it was not specifically called an Integrated Living Schedule, it has in effect been the way modifications ranging from those required post-Three Mile Island through the Systematic Evaluation Program to responses to other activities have accomplished. As we have a small staff which limits our resources, it has been necessary to schedule jointly with our your staff members the implementation of backfits and modifications to the facility. We have conducted our integrated scheduling with you in a spirit of joint cooperation and have found that it, in fact, does accomplish your intentions as specified in Reference 1. We have not required you to issue Enforcement Orders upon us in order to accomplish changes. We definitely feel the integrated schedule to be a benefit for utilities in working with the Commission. We do not require any modifications to our Technical Specifications to continue this program with you.

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Operating Reactors Branch #5
NRC Division of Licensing

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II. STATUS

The method of prioritizing for the integrated scheduling in use at this facility is a combination of engineering judgment, NRC requirements and cost benefit analysis. It should be noted that our definition of cost benefit analysis includes benefits in dose reduction to members of the general public as well as benefits in risk reduction to the general public. It includes cost financially to the licensee as well cost in radiation exposure to the licensee's employees. All of these factors receive consideration in making a judgment as to which item has a greater urgency. As stated previously, we do not feel that an additional submittal to the NRC is required. We would certainly be willing to meet at any time with your staff to discuss the integrated scheduling program.

III. ADDITIONAL ITEMS

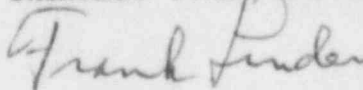
You requested our observations on how utility-sponsored availability/reliability projects might be credited for plant safety enhancement. It is our feeling that there is a need by utilities to look at the entire integrated plant and to do as much as possible to reduce facility transients. This benefits both the utility in maintaining a higher level of production and the public in that it puts the plant in an off-normal condition with less frequency. It is our feeling that the NRC can, in integrating modifications for the facility, consider utility-initiated modifications with the same prioritization system used for requested facility modifications by the NRC. This mechanism will be equally applicable to both and, as long as both the licensee and the NRC review the basis for scheduling, there should be no problem scheduling utility-proposed enhancement with a greater priority than an NRC proposed modification.

An integrated schedule is an excellent opportunity to improve the reliability and safety of operating nuclear plants. We have found our participation in it these past years to be very supportive of nuclear safety. We see no need or benefit, however, to formalizing our modification schedule. Making such a schedule subject to licensing requirements would only hinder the flexibility an integrated schedule can provide and create an additional workload.

If you have any questions, please feel free to contact me.

Very truly yours,

DAIRYLAND POWER COOPERATIVE



Frank Linder, General Manager

FL:JDP:dh

cc - J. G. Keppler, Reg. Admin., NRC-DRO III
NRC Resident Inspector
R. Dudley, Project Manager

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