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NG-97-0578
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Mr. Samuel J. Collins
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center (DAEC)
Docket No: 50-331
Op. License No: DPR-49
Schedule and Milestones for the DAEC Conversion to the Improved Technical
Specifications (ITS)

Reference: J. Franz (IES) to F. Miraglia (NRC), "Submittal of License Amendment Request to
Convert the DAEC Technical Specifications to the Improved Technical
Specifications (NUREG-1433), (RTS-291)," NG-96-2322, dated October 30, 1996.

File: A-117

Dear Mr. Collins:

As discussed in the referenced letter, implementation of the DAEC ITS is planned for the fourth quarter of 1997. This schedule is based upon a requalification examination for licensed operators in December, 1997 and to allow time for sufficient planning to support the Spring 1998 refueling outage (RFO 15). To meet this schedule, and acknowledging that additional review time will be needed by the Staff to support review of the ITS, we requested in the referenced letter that the NRC issue the draft Safety Evaluation (SE) for our TS conversion by July 31, 1997, with final approval by October 31, 1997.

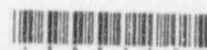
Based upon the detailed review of the DAEC ITS Implementation Plan and the development of the associated milestones, we have established an implementation date of December 4, 1997. Accordingly, we recognized the need to revise our originally requested date for the final SE. In order to meet this implementation date, we request that the final SE be issued by the NRC no later than September 30, 1997.

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The reasons for the NRC milestone dates remain the same. The following information is being provided to the Staff to establish the basis of these milestones and the potential impact on the DAEC's ability to perform an orderly transition from the current Technical Specifications to the ITS.

Specifically, the implementation date of December 4, 1997 supports the 1997 licensed operator requalification examination schedule and will provide sufficient time to confirm that the training conducted on the ITS has adequately prepared the operators to implement the ITS. Additionally, the SE milestones are directly linked to the preparation and planning for RFO 15, currently scheduled to begin March 5, 1998. These milestone dates will support an efficient and safe outage. One of the most significant improvements gained by our conversion to the ITS is the more clearly stated requirements during plant shutdowns for refueling from those given in our "custom" Technical Specifications.

A general overview of the DAEC outage planning process may prove helpful in understanding the link between outage planning and the SE milestones. Our current outage planning process includes three levels (or phases). Level I is a top level overview of the outage and includes identification of major milestones and work scope, and is issued approximately twelve months before the outage. This phase has been completed for RFO 15. Level II involves identifying system out-of-service windows to plan work from the standpoints of risk, work efficiency, and TS compliance. This preliminary schedule is issued approximately ten months prior to the start of the outage. Level III is a detailed work plan at the individual task level, which typically involves thousands of items. The Level III draft is issued six months prior to the outage (currently scheduled for September 1st).

Specific milestones evaluated as part of the DAEC Implementation Plan include:

- The initial licensed operator training class commences May 5, 1997 (this class will only be trained on the ITS). The SE milestones provide the needed time for task analysis and training material development to support the class schedule.
- The annual licensed operator requalification examination cycle begins October 13, 1997. The draft and final SE are needed to ensure adequate time for task analysis and for exam material preparation, review and approval.
- The rewrite of surveillance test procedures performed during refueling outages is scheduled to start July 1, 1997. The issuance of the draft SE by July 31st will provide the necessary input for any rewrites to these procedures, based on the latest negotiations and comment resolution with the Staff.
- The DAEC currently utilizes a work scheduling process for reviewing on-line surveillance tests and maintenance that begins approximately nine weeks in advance of the work. This work planning for the ITS will begin September 1, 1997 to support the December 4th date. NRC and DAEC dialogue on the draft SE will be critical to support this scheduling review. The September 30th date for the final SE ties directly to this work schedule.