

November 27, 2012

NG-12-0461 10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

Duane Arnold Energy Center Docket No. 50-331 Renewed Op. License No. DPR-49

Response to NRC 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 2.3, Flooding

- References: 1) NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012, Accession No. ML12073A348
 - 2) NextEra Energy Duane Arnold, LLC Letter, "NextEra Energy Duane Arnold, LLC's 90 Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Flooding Aspects of Recommendations 2.1 and 2.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, "NG-12-0233, dated June 8, 2012, Accession No. ML12165A468
 - 3) NRC Letter to Nuclear Energy Institute, Endorsement of Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," dated May 31, 2012, Accession No. ML12144A142

On March 12, 2012, the NRC staff issued Reference 1 requesting information pursuant to Title 10 of the Code of Federal Regulations 50.54(f). Enclosure 4 of that letter contains specific Requested Information associated with Near-Term Task Force Recommendation 2.3 for Flooding. Item 2 of the Requested Information asks for a final walkdown report, which is to include the following:

- a. Describe the design basis flood hazard level(s) for all flood-causing mechanisms, including groundwater ingress.
- b. Describe protection and mitigation features that are considered in the licensing basis evaluation to protect against external ingress of water into SSCs important to safety.
- c. Describe any warning systems to detect the presence of water in rooms important to safety.

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- d. Discuss the effectiveness of flood protection systems and exterior, incorporated, and temporary flood barriers. Discuss how these systems and barriers were evaluated using the acceptance criteria developed as part of Requested Information item 1.h.
- e. Present information related to the implementation of the walkdown process (e.g., details of selection of the walkdown team and procedures) using the documentation template discussed in Requested Information item 1.j, including actions taken in response to the peer review.
- f. Results of the walkdown, including key findings and identified degraded, nonconforming or unanalyzed conditions. Include a detailed description of the actions taken or planned to address these conditions using the guidance in Regulatory Issues Summary 2005-20, Revision 1, including entering the condition in the corrective action program.
- g. Document any cliff-edge effects identified and the associated basis. Indicate those that were entered into the corrective action program. Also include a detailed description of the actions taken or planned to address these effects.
- h. Describe any other planned or newly installed flood protection systems or flood mitigation measures including flood barriers that further enhance the flood protection. Identify results and any subsequent actions taken in response to the peer review.

Per Reference 1, the above report is to be submitted within 180 days of the NRC's endorsement of the walkdown procedure and should include a list of any areas that could not be inspected due to inaccessibility and should identify a schedule for when the walkdown will be completed.

Per Reference 2, NextEra Energy Duane Arnold, LLC (hereafter, NextEra Energy Duane Arnold) confirmed that it will use the NRC-endorsed flooding walkdown procedure NEI 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features" and submit a report by November 27, 2012, which corresponds to 180 days after NRC endorsement of the NEI guidance (Reference 3). The enclosed report, Flooding Walkdown Report, NEE006-PR-001, Revision 0, was prepared in accordance with the guidance of NEI 12-07 and provides the requested flooding walkdown information. This submittal completes NextEra Energy Duane Arnold's response to the Reference 1, Enclosure 4 information request.

This letter makes no new commitments or changes to any existing commitments.

Should you have any questions regarding this submittal, please contact Ken Putnam, at 319-851-7238.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2012

Richard L. Anderson

Vice President, Duane Arnold Energy Center

NextEra Energy Duane Arnold, LLC

Enclosure

cc: NRC Regional Administrator (Region III)

NRC Resident Inspector Office (DAEC)

NRC Licensing Project Manager (DAEC)