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J. O'Brien

64FR 66213
Nov. 24, 1999



ALLIANT ENERGY.

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RULES & DIR. BRANCH
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NG-2000-0030
January 7, 2000

David L. Meyer, Chief, Rules and Directives Branch,
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Comments on Revised Criteria for Post Accident Sampling System
File: A-100, A-119

Mr. Meyer:

In a Federal Register Notice on November 24, 1999 (64 FR 66213), the NRC requested comments by January 10, 2000 on Revised Criteria for Post Accident Sampling System (PASS). IES Utilities submits the following public comments on the proposed change to PASS.

We would like to begin by reiterating our commitment to protecting public health and safety. We have reviewed the two reports from Westinghouse Owners Group and Combustion Engineering Owners Group regarding the removal of the PASS system from the licensing basis. IES Utilities supports the elimination of the PASS system. In addition, IES Utilities does not believe that the PASS system is useful in assessing Emergency Action Levels or Protective Action Recommendations.

IES Utilities has conferred with our offsite agencies, specifically the Iowa Department of Public Health and the associated risk counties. Due to our integrated response effort the State of Iowa and associated risk counties do not need the PASS system to develop protective action guidelines. In addition, we have procedures that dictate our response effort well in advance of a PASS sample being obtained and the data analyzed. Therefore, the State's decision-making process will not be adversely affected by the removal of the PASS system.

We appreciate the opportunity to comment on the proposed rule and thank you for your consideration of our comments.

Sincerely,

Kenneth E. Peveler
Manager, Regulatory Performance

add:
J. O'Brien

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