

August 3, 2001

Mr. Gary Van Middlesworth
Site General Manager
Duane Arnold Energy Center
Nuclear Management Company, LLC
3277 DAEC Road
Palo, IA 52324-9785

SUBJECT: DUANE ARNOLD ENERGY CENTER - SINGLE-FAILURE PROOF STATUS OF REACTOR BUILDING CRANE (TAC NO. M97242)

Dear Mr. Van Middlesworth:

In your May 10, 1996, response to Nuclear Regulatory Commission (NRC) Bulletin 96-02, "Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment," you identified an issue regarding the single-failure proof status of the reactor building crane at the Duane Arnold Energy Center (DAEC). Specifically, you noted that the DAEC Updated Final Safety Analysis Report (UFSAR) Section 9.1.4.4.5, states that the reactor building crane is single-failure proof in accordance with the requirements of NUREG-0554. However, the NRC safety evaluation (SE) for Amendment No. 195 to the DAEC Technical Specifications (TS), states that the reactor building crane cannot be considered single-failure proof because the NRC did not review its seismic analysis. You further noted, that since the implementation of Phase II of NUREG-0612 was suspended with the issuance of Generic Letter (GL) 85-11, "Completion of Phase II of 'Control of Heavy Loads at Nuclear Power Plants,' NUREG 0612," it was unclear whether NRC review of the seismic analysis was required to support the current UFSAR evaluation.

By letter dated September 13, 1996, you provided background information on the modification that indicated your belief that you had upgraded the reactor building crane to single-failure proof. You also stated your view that with the issuance of GL 85-11, NRC review of the seismic analysis was not required and that you considered the reactor building crane to be single-failure proof. Your letter requested NRC's concurrence on this issue. The NRC cannot concur on the status of the crane without reviewing the seismic calculations.

The revision to the DAEC UFSAR that described the reactor building crane as being upgraded to a single-failure proof design in accordance with NUREG-0554, was performed in accordance with 10 CFR 50.59. Because you made the determination that the revision did not involve an unreviewed safety question (USQ), the change was reported to the NRC in accordance with 10 CFR 50.71e and the change to the UFSAR was not required to be reviewed and approved by the NRC.

In reviewing your request for Amendment No. 195 to rerack the spent fuel storage pool, the NRC staff determined that a review of the seismic analysis to give credit for DAEC for a single-failure proof crane during the rerack was not necessary in that particular instance. In the case of the rerack, other measures in place allowed for the issuance of the amendment without addressing whether DAEC had a single-failure proof crane.

G. Van Middlesworth

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The NRC staff's decision not to perform a review of the seismic analysis in the case of Amendment No. 195, does not affect your evaluation that supported the UFSAR revision describing the upgraded crane. However, your evaluation is subject to NRC review for future DAEC submittals that take credit for the single-failure proof crane. Therefore, in response to the issue raised in your May 10, and September 13, 1996, letters, NRC review of the seismic analysis for the reactor building crane is required to support the current UFSAR evaluation.

We expect you to correct the USFAR to clarify that the NRC has not endorsed the crane as single-failure proof. In addition, without our review of the seismic analysis the NRC cannot determine that the crane is single-failure proof. Further, until you submit your seismic analysis for the crane and the NRC staff has had an opportunity to review the analysis, the crane is not considered single-failure proof and you cannot take credit for a single-failure proof crane. Should you have any questions, please contact me at 301-415-2020.

Sincerely,

/RA/

Brenda L. Mozafari, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-331

cc: See next page

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Sincerely,

/RA/

Brenda L. Mozafari, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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