

ACCESSION NBR: 7910150268 DOC. DATE: 79/10/05 NOTARIZED: YES DOCKET #
 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH. NAME AUTHOR AFFILIATION
 ROOT, L. D. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation

SUBJECT: Forwards assessment of effect of nonsafety sys failures on
 safety sys performance, in response to 790917 ltr re IE Info
 Notice 79-22.

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Iowa Electric Light and Power Company

October 5, 1979
LDR-79-225

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

This letter is our response to your letter dated September 17, 1979 concerning IE Information Notice 79-22. Enclosed you will find an assessment of the Duane Arnold Energy Center (DAEC) relative to the effect of non-safety system failures upon safety system performance. The report also contains the more specific and comprehensive information and analysis in the format requested by the NRC Staff during a briefing on Thursday, September 20, 1979.

The assessment and analysis were performed by our NSSS Vendor on a generic basis and reviewed by Iowa Electric, Nuclear Generation Division on a DAEC unique basis. As a result of this assessment, we have not identified any impact on safety actions or analysis conclusions which would increase the consequences of any FSAR events.

Three signed and notarized originals and thirty-seven additional copies of this letter and enclosure are submitted herewith. This submittal consisting of the foregoing letter and enclosure hereto is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By: *Larry D. Root*
Larry D. Root
Assistant Vice President
Nuclear Generation

Subscribed and Sworn To Before Me On This 5th day of October,
19 79.



Linda R. Bales
Notary Public In And For
State of Iowa

7910150268

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
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LDR/RFS/mz

Enclosure

cc: R. Salmon
D. Arnold
S. Tuthill
L. Liu
E. Hammond
K. Meyer
D. Wilson
T. Kevern (NRC)

TABLE - ENVIRONMENTAL INTERACTION

| | | Main Steam Line: | | | | Feedwater | | | LOCA Inside Breaks | | RWCU | Isolation Condenser | RCIC | HPCI |
|---------------------------------|----------|------------------|-----------------|------------------|------------------|-----------|------------------|------------------|-----------------------|-----|---------|------------------------|---------|---------|
| | Location | Inside Small | Inside Large | Reactor Bldg. | Turbine Bldg. | Inside | Reactor Bldg. | Turbine Bldg. | SML | LRG | Outside | Outside | Outside | Outside |
| RECIRC SYSTEM | | | | | | | | | | | | | | |
| Pumps | DW | 2 | 2 | 4 | 4 | 2 | 4 | 4 | 2 | 2 | 4 | N/A | 4 | 4 |
| Valves & Operators | DW | 3 | 3 | 4 | 4 | 3 | 4 | 4 | 3 | 3 | 4 | N/A | 4 | 4 |
| MG Sets | RB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| MCC | RB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| Flow Control Syst. | CR | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| Control Inst. Transmitters | RB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| FEEDWATER DELIVERY SYST. | | | | | | | | | | | | | | |
| Flow Elements | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| Level | DW/RB | 2 | 2 | 4 | 4 | 2 | 4 | 4 | 2 | 2 | 4 | N/A | 4 | 4 |
| Pumps | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| Valves & Operators | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| MCC | TB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| Flow Control System | CR | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| FW Heating | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| Instrument Air | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| Control Inst. Transmitter | RB/TB | 4 | 4 | 2 | 2 | 4 | 2 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| TURBINE PRESSURE CONTROL | | | | | | | | | | | | | | |
| Bypass Valves | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| Pressure Sensors | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| Control System | CR | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| NEUTRON MONITORING SYST. | | | | | | | | | | | | | | |
| LPRMs & Cables | DW/RB | 2 | 2 | 2 | 4 | 2 | 2 | 4 | 2 | 2 | 2 | N/A | 4 | 4 |
| APRMs & Cables | DW/RB | 2 | 2 | 2 | 4 | 2 | 2 | 4 | 2 | 2 | 2 | N/A | 4 | 4 |
| RPIS/Rod Block Monitor | DW/RB | 2 | 2 | 2 | 4 | 2 | 2 | 4 | 2 | 2 | 2 | N/A | 4 | 4 |
| TIP | DW/RB | 2 | 2 | 2 | 4 | 2 | 2 | 4 | 2 | 2 | 2 | N/A | 4 | 4 |
| REACTOR PROTECTION SYST. | | | | | | | | | | | | | | |
| Turbine Scram | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| MG Set | CB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |

TABLE - ENVIRONMENTAL INTERACTION (Cont.)

| | | Main Steam Line: | | | | Feedwater | | | LOCA Inside Breaks | | RWCU | Isolation Condenser | RCIC | HPCI |
|--------------------------------------|-----------|------------------|-----------------|------------------|------------------|-----------|------------------|------------------|-----------------------|-----|---------|------------------------|---------|---------|
| Location | | Inside Small | Inside Large | Reactor Bldg. | Turbine Bldg. | Inside | Reactor Bldg. | Turbine Bldg. | SML | LRG | Outside | Outside | Outside | Outside |
| REACTOR MAN. CONT. SYST. | RB/CR | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| SRV SYSTEM (Non ADS) | DW/RB | 3 | 3 | 3 | 4 | 3 | 3 | 4 | 3 | 3 | 4 | N/A | 4 | 4 |
| RBCCW SYSTEM | RB | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | 2 | N/A | 4 | 4 |
| RWCU | DW/RB | 3 | 3 | 2 | 4 | 3 | 2 | 4 | 3 | 3 | 2 | N/A | 2 | 2 |
| SUPPRESSION POOL | | | | | | | | | | | | | | |
| Temperature Monitoring | RB/Torus | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| Level Monitoring | RB/Torus | 4 | 4 | 2 | 4 | 2 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| CIRCUL. WATER SYSTEM (Non Safety) | Intake/TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| HVAC SYSTEM | All | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | N/A | 2 | 2 |
| NON IE BATTERY SYST. | CB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| AC AUXILIARY ELECTRIC | RB/TB/CB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| CONDENSATE TRANSF. & STOR. | TB | 4 | 4 | 4 | 3 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| MAIN TURBINE & CONTROLS | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| MAIN CONDENSER & CONTROL | TB | 4 | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | N/A | 4 | 4 |
| INSTRUMENT AIR SYSTEM | | | | | | | | | | | | | | |
| Compressors | TB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| Piping & Controls | TB/RB/DW | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | N/A | 2 | 2 |
| FIRE PROTECTION SYSTEM | TB/RB/CR | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| CRD Hydraulic System (Non Scram) | RB | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |

TABLE - ENVIRONMENTAL INTERACTION (Cont.)

| | | Main Steam Line: | | | | Feedwater | | | LOCA Inside Breaks | | RWCU | Isolation Condenser | RCIC | HPCI |
|-----------------|----------|------------------|-----------------|------------------|------------------|-----------|------------------|------------------|-----------------------|-----|---------|------------------------|---------|---------|
| | Location | Inside Small | Inside Large | Reactor Bldg. | Turbine Bldg. | Inside | Reactor Bldg. | Turbine Bldg. | SML | LRG | Outside | Outside | Outside | Outside |
| RV HEAD VENT | DW | 2 | 2 | 4 | 4 | 2 | 4 | 4 | ① | ① | 4 | N/A | 4 | 4 |
| SLC SYSTEM | DW/RB | 3 | 3 | 2 | 4 | 3 | 2 | 4 | 3 | 3 | 2 | N/A | 2 | 2 |
| REMOTE SHUTDOWN | RB | 4 | 4 | 2 | 4 | 4 | 2 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| AIR COOLERS | RB | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | N/A | 4 | 4 |
| SUMP PUMP | RB | 2 | 2 | 2 | 4 | 2 | 2 | 4 | 2 | 2 | 4 | N/A | 2 | 4 |

TABLE (Cont'd.)

| <u>SYSTEM</u> | <u>ANY HIGH ENERGY BREAK</u> |
|--|------------------------------|
| Lighting | 5 |
| Communications | 5 |
| Service Air | 5 |
| Equip. Drain Piping | 5 |
| Drywell Temp. Monitoring | 5 |
| Under Vessel Maintenance Equip. | 5 |
| Process Computer | 5 |
| Area Radiation Monitoring | 5 |
| Process Radiation Monitoring (Non Safety Part) | 5 |
| Sampling Systems | 5 |
| Maintenance Monorails | 5 |
| Environs Monitoring | 5 |
| Demineralized Water | 5 |
| Potable Water | 5 |
| Screen Wash | 5 |
| Hydrogen Cooling | 5 |
| Condenser Priming | 5 |
| TBCCW | 5 |
| Stator Cooling | 5 |
| Offgas | 5 |
| Radwaste | 5 |

TABLE (Cont'd)

1. Environmental induced malfunction may provide adverse response, i.e. increase in previously reported peak for;

Drywell Pressure
Wetwell Pressure
Suppression Pool Temperature
Fuel Clad Temperature

2. Environmental induced malfunction will not provide adverse response.
3. System is qualified for adverse environment.
4. System will not experience adverse environment.
5. No conceivable system failure can affect response.

EFFECT OF REACTOR HEAD VENT OPENING UPON A LOCA

The reactor head vent line is a small (2") line with two valves, which are air-operated. The probability of a LOCA causing a steam environment which could cause both of these series valves to open at the start of the event is small for air-operated valves. To bound the worst case however, we have assumed a LOCA combined with a simultaneous opening of this vent line. Depending on the size of the LOCA, there could be a $\pm 10^{\circ}\text{F}$ impact on Peak Clad Temperature. A later opening of the head vent line would reduce the maximum effect stated above.