

Central file

50-331

Iowa Electric Light and Power Company

October 12, 1979
LDR-79-229

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

The purpose of this letter is to describe the intent of Iowa Electric Light and Power Company regarding IE Bulletin 79-14. In the "actions to be taken by licensees," the bulletin requested completion of three items whose main purpose was to identify non-conformances which might affect system operability. We have responded to Items 1 and 2 of the bulletin via our letters from L. Root to J. Keppler dated August 1, 1979 and August 31, 1979, and we are presently in the process of performing the inspections requested in Item 3 of the bulletin. By October 30, 1979 we will have completed inspection of all accessible safety related systems which will represent approximately 60% of all safety related systems.

Our findings thus far have shown that we not only have found no effects on system operability, but also have found no non-conformances. Therefore, it is becoming increasingly apparent that the inspections at the Duane Arnold Energy Center are unnecessary. In addition, as a result of past maintenance and repair work which we have done on normally inaccessible systems, we are confident that group of systems (normally inaccessible) are at least of equal quality as those which are accessible.

Based upon the results of completion of inspection of accessible systems we will either determine that:

- 1) If we continue to find no effects on system operability there will be no need to continue the inspection and we intend to terminate it; or
- 2) If we become less confident of system adequacy it will be necessary to include part or all of the normally inaccessible systems in the inspection, but to avoid an unscheduled shutdown, it is intended that the inspection would continue at the beginning of our early first-quarter 1980 refueling shutdown.

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Mr. James G. Keppler, Director

October 12, 1979

LDR-79-229

Page 2

The intentions described above are based upon considerations of hazards to public safety and the cost-benefit ratios. The estimated cost of continuing the inspection to include normally inaccessible systems is \$700,000. To provide an unscheduled shutdown for continuation of the inspection would cost an additional estimated 21 to 28 days of replacement power. There would be no increase in hazard to public safety as a result of determination 1) above, and the increase as a result of determination 2) is judged to be insignificant.

If you have any further comments in this matter, we would welcome an opportunity to discuss it further with you and your staff.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/RFS/mz

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

Director, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Director, Division of Operating Reactors
Office of Nuclear Reactor Regulation
Washington, D.C. 20555