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Iowa Electric Light and Power Company

General Office Cedar Rapids. Iowa

September 9, 1977 IE-77-1693

LEE LIU
VICE PRESIDENT - ENGINEERING

50-331

Mr. George Lear, Chief Operating Reactors Branch 3 Division of Operating Reactors Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Lear:

Your letter of August 8, 1977 requested that we submit an application for amendment to our license to change the Technical Specifications for safety relief valves and ADS valves within 30 days of receipt of your letter.

Upon evaluation of your request, we find that we cannot comply within the above time constraints. Of particular concern to us is the requirement to test the valves at nominal operating pressure. Amendment 34, approved in May, 1977, to the Duane Arnold Energy Center Operating License modified the plant Technical Specifications to require testing of these valves in a similar manner, however, the requirement was only that pressure be greater than, or equal to, 100 psig. We are concerned with the increased test requirements and test conditions seriously degrading the reliability of the plant. With the exception of the increased pressure requirements, we believe our present practices address your concerns.

Iowa Electric proposes to submit Technical Specifications concerning the safety relief valves or to provide justification for alternate Technical Specifications by November 9, 1977. If you desire further discussion, please contact us.

Very truly yours,

Cee Liu

Vice President, Engineering

LL/KAM/ms

cc: K. Meyer

D. Arnold

R. Lowenstein

R. Clark (NRC)

L. Root