NOV 8 - 1982

Docket No. 50-331

Mr. Duane Arnold Chairman of the Board and Chief Executive Officer Iowa Electric Light and Power Company P. O. Box 351 Cedar Rapids, Iowa 52406

Dear Mr. Arnold:

SUBJECT: RESPONSE TO GENERIC LETTER 81-04 ON IMPLEMENTATION OF

NUREG-0313, REV. 1

Re: Duane Arnold Energy Center

Our Generic Letter 81-04 to all BWR licenses dated February 26, 1981 requested you to review all ASME Code Class 1 and 2 pressure boundary piping, safe ends and fitting material at your BWR facilities to determine if it meets the material selection, testing and processing guidelines set forth in NUREG-0313, Rev. 1, a copy of which was enclosed with the generic letter. This letter requested that you propose a schedule to: 1) identify any materials that do not meet the guidelines, 2) implement the augmented inservice inspection requirements specified in Section IV of NUREG-0313, Rev. 1, 3) discuss your plans to replace (to the extent practicable) nonconforming materials and 4) install more sensitive, diverse leak detection systems. Our generic letter offered the option of providing a description, schedule and justification for alternative actions that would reduce the susceptibility of pressure boundary piping and safe ends to intergranular stress corrosion cracking (IGSCC) or increase the probability of early detection of leakage from pipe cracks.

Based on our review of your response to our Generic Letter 81-04, we have determined that we need the additional information identified in the enclosure to this letter. In view of recent developments regarding pipe cracking in BWRs, we request that you respond within 30 days of receipt of this letter. We also request that you send a copy of your response directly to our contractor:

EG&G Idaho, Inc. P. O. Box 1625 Idaho Falls, Idaho 83415 ATTN: Mr. Wayne Roberts

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This request for information is specific to one licensee. fore, OMB clearance is not required for this request under P. L. 96-511.

If you have any questions, please contact your Project Manager, Frank L. Apicella at 301-492-9798.

Sincerely,

Original signed by D. B. Vassallo Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Enclosure: Request for Additional Information

cc w/enclosure: See next page

Distribution:

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Mr. Duane Arnold Iowa Electric Light & Power Company

cc:

Mr. Robert Lowenstein, Esquire Harold F. Reis, Esquire Lowenstein, Newman, Reis and Axelrad 1025 Connecticut Avenue, N. W. Washington, D. C. 20036

Office for Planning and Programming 523 East 12th Street
Des Moines, Iowa 50319

Chairman, Linn County Board of Supervisors Cedar Rapids, Iowa 52406

Iowa Electric Light & Power Company ATTN: D. L. Mineck P. O. Box 351 Cedar Rapids, Iowa 52406

U.S. Environmental Protection Agency Region VII Office Regional Radiation Representative 324 East 11th Street Kansas City, Hissouri 64106

U.S. Nuclear Regulatory Commission Resident Inspector's Office Rural Route #1 Palo, Iowa 52324

James G. Keppler Regional Administrator, Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

mequest for Additional Information Implementation of NUREG-0313, Rev. 1 Duane Arnold Energy Center Docket No. 50-331

- 1. Unidentified Leakage Monitoring. (IV.B.1 of NUREG-0313, Rev. 1)
 - a. Identify the methods to detect and monitor unidentified leakage in the pressure boundary piping of your BWR. Some of these methods are enumerated in Regulatory Guide 1.45, Paragraph b.
 - b. Please fill out the attached table of information regarding the systems identified in the above paragraph.
- 2. Augmented ISI of Partially Nonconforming Service Sensitive Pipe

Attachment 1 of the L. D. Root to Harold Denton letter of June 30, 1981 (LDR-81-225) states that "Augmented inservice inspection has been done on the above systems in accordance with the guidelines of NUREG-0313, Rev. 1."

- a. Please identify the methods for augmented ISI of the partially nonconforming service sensitive pipe (IV.B.3 of NUREG-0313 Rev. 1).
- b. Provide a copy of specifications for the augmented ISI method or methods. (IV.B.3 of NUREG-0313 Rev. 1).
- c. Identify each of the augmented ISI methods used and the training and certification levels the individuals using those methods received. (IV.B.3 of NUREG-0313 Rev. 1). Indicate if cracked specimens are used in your training.
- d. Identify the proportion of the partially nonconforming service sensitive pipe that is being inspected. (IV.B.2.b of NUREG-0313 Rev. 1).
- e. Identify the inspection interval of each system of the partially nonconforming service sensitive pipe. (IV.B.2.b of NUREG-0313 Rev. 1).
- f. Identify the Stress Rule Index Numbers for the welded joints in the partially nonconforming service sensitive pipe. (IV.B.1.b (6) of NUREG-0313 Rev. 1).
- 3. Augmented ISI of Partially Nonconforming Nonservice Sensitive Piping

Attachment 1 of the L. D. Root to Harold Denton letter of June 30, 1981 (LDR-81-225) gives some information on partially nonconforming nonservice sensitive piping (hereinafter piping).

- a. Please identify the methods for augmented ISI of the piping (IV.B.3 of NUREG-0313 Rev. 1).
- b. Please provide a copy of the specifications for the augmented ISI methods or methods (IV.B.3 of NUREG-0313 Rev. 1).

- c. Identify each of the augmented ISI methods used and the training and certification levels the individuals using those methods received. Indicate if cracked specimens are used in your training. (IV.B.3 of NUREG-0313 Rev. 1).
- d. Identify the proportion of the piping that is being inspected (IV.B.2.b of NUREG-0313 Rev. 1).
- e. Identify the Stress Rule Index Numbers for the welded joints in the partially piping. (IV.B.l.b (6) of NUREG-0313 Rev. 1).
- f. Identify the proposed inspection interval for each system of partially piping (IV.B.l.b of NUREG-0313 Rev. 1).

INFORMATION REQUESTED ON LEAK DETECTION SYSTEM

	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Type of System	Is System Operable (yes/no)	Leak Rate Sensitivity (gpm)	Time Required To Achieve Sensitivity (hours)	Is System Functional After SSE (yes/no)	Control Room Indications (alarms) (recorders)	Calibration or Testing During Operation (yes/no)	Documentation Reference for (1) Thru (6)