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 ROOT, L.D. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director *mch*

SUBJECT: Responds to DG Eisenhower 801001 ltr re BWR scram sys.
 Reassessment of scram sys shows no 10CFR50 App A general
 design criteria deficiencies. Will provide results of
 re-evaluation by 801215.

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OCT 31 1980

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Iowa Electric Light and Power Company

October 23, 1980
LDR-80-296

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

50-331

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 Mr. Eisenhut's letter dated October 1, 1980 concerning the BWR Scram System.

Iowa Electric Light and Power Company is a participant in the BWR Owners' Group and supports the effort of the Scram Discharge Volume Sub-Group as it applies to the Duane Arnold Energy Center (DAEC).

The results of the reassessment of the scram system which we have performed show no deficiencies with respect to the General Design Criteria of 10CFR50 Appendix A. We intend to both reevaluate our scram system and modify as necessary to meet additional design and performance criteria developed by the Sub-Group, and provide by December 15, 1980 the results of our reevaluation including modifications and schedules for implementation as they apply to the DAEC. This commitment is dependent upon timely completion of the on-going discussions with the NRC and development of the Sub-Group criteria.

Three signed and 37 additional copies of this letter are transmitted herewith. The foregoing letter 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

LDR/RFS/ld

cc: R. Salmon
D. Arnold
L. Liu
S. Tuthill
K. Meyer
D. Mineck
J. Van Sickle
K. Eccleston (NRC)
NRC Resident Office
File: A-107a, A-107b
LC801001

Subscribed to and Sworn to Before Me
on this 23 day of October,
19 80.

A001
5/3/0

Mary E. Benfield
Notary Public In and For The
State of Iowa



MARY E. BENFIELD
COMMISSION EXPIRING
SEPTEMBER 30, 1983

8010300480



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 1, 1980

50-331

TO ALL BWR LICENSEES

SUBJECT: BWR SCRAM SYSTEM

On June 28, 1980, during a routine shutdown of the Browns Ferry 3 reactor, a manual scram failed to insert all control rods. I&E Bulletin 80-17 with subsequent supplements 1, 2 and 3 has been issued which has required system modifications, procedural and design verifications, additional surveillance and tests, and analyses to assure adequate short-term performance of existing scram systems on operating plants.

However, we believe further hardware and procedural changes will be required to assure adequate long-term scram system reliability. We are aware that the BWR owners have formed a Sub-Group of the BWR Owners Group to address this matter and are in the process of developing design and performance criteria.

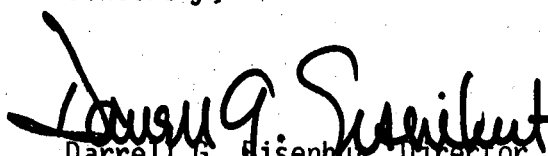
Therefore, in order to determine whether or not your license should be modified, please provide us in writing, under oath or affirmation, within 25 days of the date of this letter your plans for participation in this effort. In addition, your response should include:

- (1) The results of any reassessment of your present scram system to confirm conformance with the General Design Criteria (Appendix A to 10 CFR 50).
- (2) Whether you intend to reevaluate your present scram system and modify it as necessary to meet the additional design and performance criteria developed by the Owners Sub-Group. If not, what criteria will be used to judge the adequacy of your present scram system?
- (3) Whether you intend to provide by December 15, 1980, the results of the above reevaluation (including required modifications) along with a schedule for implementation. If not, why not.

This information is requested under the authority of 10 CFR 50.54(f) of the Commission's regulations.

If you have any questions concerning this matter, please call your Project Manager.

Sincerely,


Darrell G. Eisenhower, Director
Division of Licensing

cc: Service Lists