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

SUBJECT: Responds to NRC 810314 ltr re environ qualification of safety-related electrical equipemnt. Approx 75% of components in App B will not be subjected to harsh environ as result of postulated accident. Investigation of concerns ongoing.

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Iowa Electric Light and Power Company

MARCH 30, 1981
LDR-81-113

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
OF NUCLEAR DIVISION

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

Dear Mr. Denton:

This letter provides our response to Mr. Novak's March 14, 1981 letter regarding environmental qualification of safety-related electrical equipment.

As requested by that letter, our review has been restricted to the preliminary list of deficiencies found in Appendix B. In view of the limited time for response, we have not developed comments on the text of the "Partial Review: Equipment Evaluation Report by the Office of Nuclear Reactor Regulation." We expect that the positions discussed in the text will appear in the Safety Evaluation Report presently being prepared by the staff and reserve comment pending issuance of the SER.

Of the equipment identified in Appendix B of your letter as requiring additional information and/or corrective action, approximately 75% of the components will not be subjected to a harsh environment as a result of the postulated accident. Under Section 4.2(4) of your report, such location is an acceptable basis to exempt equipment from qualification for harsh environments. In addition, approximately 6% of the items in Appendix B of your report are items for which an action item has been identified and justification for continued operation provided in our October 31, 1980 submittal. For those remaining items, we have reviewed the data as presented in Appendix B of your letter and have concluded that this information does not alter our previous conclusions as discussed in our submittal of October 31, 1980.

We also wish to state that we are engaged in an ongoing investigation in support of the effort to identify and resolve all concerns with respect to environmental qualification. This effort includes activities such as the pursuit of qualification documentation for existing components through individual vendor contacts and generic industry efforts, design modifications to limit severe environments to less than the qualified value for specific components and replacement of components during the current refueling outage. In addition, the procurement and installation of all new plant equipment which is important for safety is being done in accordance with the appropriate environmental qualification requirements.

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Based, among other things, on the reviews described above and all information available to us at this date, including review of your March 14 letter, we have concluded that we can continue safe operation of the plant.

The information in 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

Subscribed to and Sworn to Before Me
on this 30th day of March,
1981.

Jean R. Smith
Notary Public In and For The
State of Iowa

LDR/BR/dw

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