

Central Files

Iowa Electric Light and Power Company

July 11, 1979
LDR-79-103

50-331

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. James G. Keppler, Director
Nuclear Regulatory Commission
Office of Inspection & Enforcement
Region III
799 Roosevelt Road
Glen Ellyn, Ill. 60137

Dear Mr. Keppler:

This letter and enclosure is to document our responses to questions asked during a phone conversation at 1:00 P.M. July 11, 1979 between NRC staff members and my staff concerning my letter LDR-79-98 dated July 10, 1979. The enclosure to this letter supplements our response to your Immediate Action Letter of July 6, 1979.

If you or your staff have any questions please call.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President

LDR/glm

Enclosure

cc: All w/encl.	H. Rehrauer
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ENCLOSURE

1. Question:

During the meeting conducted July 6, 1979 Iowa Electric stated that their evaluation resulted in five failed supports. Your letter states that there would be four failed supports. Please explain the difference.

Response:

Our evaluation July 6, 1979 included one support which had been considered to fail because it was inaccessible for a torque-wrench test. This was felt to be overly conservative. In order to keep the population analyzed at 34 the next support on the list to be tested was tested and tested satisfactorily resulting in four failed supports out of 34.

2. Question:

Please provide information on how the supports to be considered failed in the stress analysis were chosen.

Response:

Supports which were near the center of gravity of the system and were considered to be semi-heavily loaded were selected for the analysis. This was considered to be a conservative selection for stress analysis considerations.

3. Question:

You have analyzed the Core Spray and HPCI systems. What are your plans for analysis of other systems.

Response:

The Core Spray suction system is presently being analyzed. The analysis should be completed on July 11, 1979. The RHR system analysis has commenced and should be complete in about one week.

Assuming that the above results are consistent with the completed analysis, Iowa Electric does not plan to analyze any other systems.

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3. Response (continued)

The RCIC system would be expected to yield results indicating less effects due to the fact it is a small diameter system compared to HPCI and that the supports generally have low loads applied.

4. Question:

When will gross failures be repaired?

Response:

Iowa Electric plans on repairing those supports seismically loaded with failed CEB as soon as possible and probably within one week.

5. Question:

How many plates were identified with one failed bolt? With two failed bolts?

Response:

There are 15 support plates identified with one or two CEB failed. Of these, seven have two bolts failed.

6. Question:

Did the HPCI analysis result in system stresses within code allowable?

Response:

Yes.

7. Question:

What is the significance between the conclusions for Core Spray stating "The system will perform its intended safety function" and the HPCI conclusions stating "The system should perform its intended safety function"?

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Response:

No differentiation was intended. The HPCI conclusions should state "The system will perform its intended function".

8. Question:

You appear to have jumped from an evaluation of four systems to a conclusion that all safety systems are operational. Please provide your rationale for making this determination.

Response:

The visual inspection of supports was conducted to lend confidence to the random sampling program statistics. The systems selected for stress analysis are considered to be representative of all safety systems. As all safety system supports were designed and installed per the same specification, our visual inspection verified the CEB failure rates, and a conservative stress analysis of representative systems was within code allowables the conclusion can be reached that all safety systems fall within the same as built and as designed condition and are therefore operable.

LDR/glm