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 IPPOLITO, T.A. Operating Reactors Branch 3

SUBJECT: Responds to 781129 ltr & supercedes licensee 790103 ltr re
 containment purging during normal plant operations. Review
 of safety actuation signal circuits w/manual override
 confirms that criteria are satisfied.

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Iowa Electric Light and Power Company

August 31, 1979
LDR-79-173

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. Thomas A. Ippolito
Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20034

Dear Mr. Ippolito:

This letter is in response to your letter of November 29, 1978, concerning containment purging during normal plant operations. This letter supercedes our letter of January 3, 1979.

Our review of all safety actuation signal circuits which incorporate manual override features confirms that the criteria as stated in your letter are satisfied. Only four (4) safety actuation signals have manual override features. The override is for the torus and drywell inboard bypass and outboard vent valves to allow venting in the long term post LOCA condition. This bypass is key actuated for each valve, has adequate administrative controls, and is annunciated. Furthermore, venting normally does not require bypass of any safety actuation signal.

Our License Event Report 79-02 reported that these valves as installed would not operate against the differential pressure resulting from a design basis LOCA and that these valves were modified to insure their operation in the above conditions. (i.e. opening limited to 30 degrees).

Our letter of January 3, 1979 stated that we would limit containment purging to an absolute minimum, not exceeding 90 hours per year. Iowa Electric will limit containment purging to a minimum, however our experience indicates that we cannot limit purging to less than 90 hours per year.

Each shutdown and subsequent startup under conditions requiring a containment entry requires approximately 18 hours purging. Deinerting and atmosphere cooling require about six hours and inerting requires about twelve hours. Iowa Electric does not consider it prudent to send personnel into the containment inerted except in extreme emergencies.

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S/O
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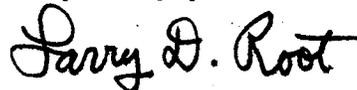
The capability to detect unidentified leakage into the drywell is significantly enhanced by the capability to enter the drywell while the plant is still at operating pressure and temperature. Verification of successful pressure boundary repairs and operational hydrostatic tests are also enhanced by the capability to enter the drywell at operating pressure and temperature. Iowa Electric believes it to be of the utmost importance to conduct the above inspections at operating pressure and temperature in the interest of minimizing any hazards to the public.

The vent and purge valves Technical Specifications require that these valves close in 5 seconds or less upon receipt of an isolation signal. It is impossible to vent the containment via any path other than the Standby Gas Treatment System (SGTS). In the event of a design basis accident, the pressure in the containment will rise to the isolation set-point within one-tenth of a second and fuel perforation will not occur until about 40 seconds into the accident, therefore, the radiological consequences from a small release to the SGTS during the first few seconds prior to fuel perforation will be an insignificant addition to the calculated radiological releases.

(1) The vent and purge valves and valve controls at the DAEC satisfy the criteria stated in your letter of November 29, 1978. (2) Safety signals are not overridden at the DAEC. (3) Negating the ability for operational hydros and the ability to investigate leakage in the drywell is not in the best interest of public health and safety. (4) A mechanism for degradation of ECCS equipment due to purging has not been identified. (5) The radiological consequences of a design basis accident requiring containment isolation during venting operations are insignificant.

The commitment to minimize purging without unduly limiting plant flexibility in the interest of safety is appropriate.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/KAM/mz

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