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

SUBJECT: Responds to NRC 791030 ltr re lessons learned short term requirements. Forwards revised description of application of NUREG-0578 items in which implementation differs in method &/or schedule from NRC requirements.

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Iowa Electric Light and Power Company

November 20, 1979  
LDR-79-302

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
NUCLEAR GENERATION

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 your letter dated October 30, 1979 concerning lessons learned short term requirements. As requested in your letter, we are providing a description pertaining to the items of NUREG-0578 in which our implementation differs in either method or schedule from the NRC requirements.

The attachment to this letter, which is Revision 1 of Enclosure A of our October 17, 1979 letter to Mr. Darrell Eisenhut, presents the above descriptions.

It is our understanding, based on a telephone conversation with DOR Project Manager, Mr. Tom Kevern, on November 19, 1979, that there had been a November 14, 1979 letter sent from Darrell Eisenhut to the BWR Owner's Group which addresses Owner's Group positions which are not acceptable to the NRC staff. Mr. Kevern also referred to the November 14, 1979 letter in listing "problem areas" that the NRC review team had found with our October 17, 1979 letter. Because of the untimely receipt of Mr. Eisenhut's letter, we respectfully decline incorporation of that letter into this response. Other "open" items which were presented by Mr. Kevern are covered in the attachment. Owner's Group positions which are referred to in the attachment are described in the Thomas Keenan to Darrell Eisenhut letters dated October 17, 1979 and November 15, 1979.

Very truly yours,

*Larry D. Root*

Larry D. Root  
Assistant Vice President  
Nuclear Generation

LDR/RFS/mz

cc: R. Salmon E. Hammond  
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L. Liu T. Kevern (NRC)  
File: A-107b

ENCLOSURE A

APPLICATION OF NUREG-0578 REQUIREMENTS

TO THE

DUANE ARNOLD ENERGY CENTER

2.1.1 Emergency Power Supply Requirements for the Pressurizer Heaters, Power-Operated Relief and Block Valves, and Pressurizer Level Indicators in PWRs

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.1.2 Performance Testing for BWR and PWR Relief and Safety Valves

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.1.3.a Direct Indication of Power-Operated Relief Valve and Safety Valve Position for PWRs and BWRs

Iowa Electric Light and Power Company's position is the same as the BWR Owners Group except for the environmental and seismic qualifications which are stated. Previous to the TMI-2 accident, the position switch instrumentation had been designed. To provide high reliability, the design was based upon two-out-of-three logic for each relief valve exhaust. The vendor specifications for the device are:

Proof Pressure	4000 psig
Burst Pressure	8000 psig
Operating Temperature	-65 to 600°F
Material	300 series SS
Radiation	10 <sup>9</sup> Rads
Enclosure	NEMA 4
Electrical Rating	DPDT, 5A, 125VDC

The device meets MIL-STD 52720. Power will be provided from one of the station's 125 volt batteries.

It is intended that the implementation will be made during the refueling outage which is planned to begin on February 9, 1980. Justification for operation during the interim is based upon the fact that the Duane Arnold Energy Center presently has temperature instrumentation installed which indicates relief valve opening. In addition, as a result of evaluation of the effect of a stuck open relief valve, procedures have been modified to require reactor cooldown if a stuck open relief valve is experienced.

ENCLOSURE A

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2.1.3.a Continued

Iowa Electric Light and Power Company is currently participating in a qualification program for pressure switches which will result in our compliance with qualification requirements.

2.1.3.b Instrumentation for Detection of Inadequate Core Cooling for PWRs and BWRs

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.1.4 Containment Isolation Provisions for PWRs and BWRs

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.1.5.a Dedicated Penetrations for External Recombiner or Post-Accident External Purge System

According to the clarification provided in the October 30, 1979 Denton letter to all Operating Nuclear Power Plants, this item does not apply to the Duane Arnold Energy Center.

2.1.5.c Capability to Install Hydrogen Recombiner at Each Light Water Nuclear Power Plant

According to the clarification provided in the October 30, 1979 Denton letter to all Operating Nuclear Power Plants, this item does not apply to the Duane Arnold Energy Center.

2.1.6.a Integrity of Systems Outside Containment Likely to Contain Radioactive Materials (Engineered Safety Systems and Auxiliary Systems)

Iowa Electric Light and Power Company's position is the same as the BWR Owner's Group.

2.1.6.b Design Review of Plant Shielding of Spaces for Post Accident Operations

Iowa Electric Light and Power Company's position is the same as the BWR Owner's Group.

2.1.7.a Automatic Initiation of the Auxiliary Feedwater System

This requirement does not apply to BWR's.

2.1.7.b Auxiliary Feedwater Flow Indication to Steam Generators

This requirement does not apply to BWR's.

2.1.8.a Improved Post-Accident Sampling Capability

Iowa Electric Light and Power Company's position is the same as the BWR Owner's Group.

2.1.8.b Increased Range of Radiation Monitors

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.1.8.c Improved In-Plant Iodine Instrumentation

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.1.9 Analysis of Design and Off-Normal Transients and Accidents

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.2.1.a Shift Supervisor Responsibilities

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.2.1.b Shift Technical Advisor

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.2.1.c Shift and Relief Turnover Procedures

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.2.2.a Control Room Access

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.2.2.b Onsite Technical Support Center

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

2.2.2.c Onsite Operational Support Center

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

Requirements Relative to Containment Level, Pressure, and Hydrogen Monitoring

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.

Requirement Relative to Remotely Operating High Point Vents

Iowa Electric Light and Power Company's position is the same as the BWR Owners' Group.