

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

IE-78-1089

July 18, 1978

LEE LIU

SENIOR VICE PRESIDENT - ENGINEERING

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

Dear Mr. Denton:

The letter from Mr. George Lear to Mr. Duane Arnold, dated May 15, 1978, asked for additional information regarding the use of RPT at the DAEC for mitigation of the consequences of ATWS.

On April 19, 1978, the NRC Division of System Safety issued the ATWS Staff Report, NUREG-0460. In the May 17, 1978 briefing to the ACRS the NRC staff stated that the following activities would take place over approximately the next two years:

- A. Review by Regulation Requirements Review Committee (RRRC).
- B. Review by ACRS.
- C. Recommendations by RRRC to office of Director of NRR.
- D. Issuance of a Commission Policy Statement.
- E. Proposed Regulation.
- F. Comments by Industry.
- G. Issuance of Regulation.

The staff also stated that decisions on backfitting were to be made, on a case-by-case basis, after an effective regulation is published.

Therefore, at the present time considerations of backfitting would appear to be premature.

The May 15, 1978, letter requests a point-by-point comparison of the existing DAEC RPT system with the criteria proposed in NUREG-0460. We acknowledge that the system presently installed at the DAEC does not meet those proposed criteria. However, Iowa Electric respectfully suggests that a detailed review would not

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be productive at this time. When the plan of action outlined above has been completed and criteria are approved, it will be possible to perform the detailed analysis and determine any appropriate plant modification. We believe that, at this stage of development of the criteria, the information provided in our letter dated October 6, 1976, is sufficient. We will be pleased to discuss this matter with you further.

Very truly yours,

Larry D. Root

Lee Liu *for*

Sr. Vice President - Engineering

LL/RFS/jo

cc: R. Salmon
D. Arnold
R. Lowenstein
R. Clark (NRC)
L. Root
File A-224