REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8112220573 DOC.DATE: 81/12/16 NOTARIZED: NO DOCKET #
FACIL:50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
AUTH.NAME AUTHOR AFFILIATION
ROOT,L.D. Iowa Electric Light & Power Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Notifies of three major areas of uncertainty that could delay proposed completion dates for Mark I mod program.

DISTRIBUTION CODE: A025S COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 2
TITLE: Mark 1 Containment (Related Info on Individual Dockets) (USI A-7)

NOTES:

| | RECIPIENT ID CODE/NAME | | COPIES LTTR | COPIES ENCL | RECIPIENT ID CODE/NAME | | COPIES LTTR | COPIES ENCL |
|---|---|---|---|---|---|---|---|---|
| ACTION: | ORB #2 BC | 01 | 7 | | | | | |
| INTERNAL: | EDO | | 1 | 0 | ELD | 13 | 1 | 1 |
| | IE | 06 | 2 | 2 | IE/DEP DIR | 08 | 1 | 1 |
| | NRR DIR | | 1 | 0 | NRR GRIMES,C | 17 | 1 | 1 |
| | NRR SIEGEL,B | | 1 | 1 | NRR/DE/MEB | | 1 | 0 |
| | NRR/DL/ORAB | 10 | 1 | 1 | NRR/DSI/ADCCS | | 1 | 0 |
| | NRR/DSI/CSB | 11 | 1 | 1 | NRR/DST/GIB | | 1 | 0 |
| | REG FILE | 04 | 1 | 1 | | | | |
| EXTERNAL: | ACRS | 12 | 10 | 10 | LPDR | 03 | 1 | 1 |
| | NRC PDR | 02 | 1 | 1 | NSIC | 05 | 1 | 1 |
| | NTIS | | 1 | | | | | |

MA
4

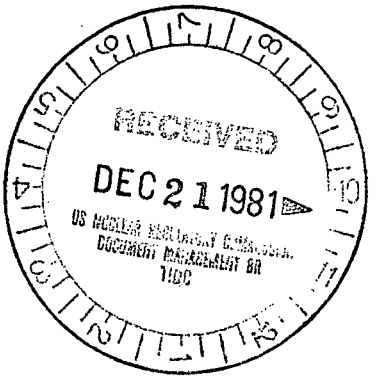
DEC 30 1981

TOTAL NUMBER OF COPIES REQUIRED: LTTR 35 ENCL 30

Iowa Electric Light and Power Company

December 16, 1981
LDR-81-344

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:

Attachments to the letter from Mr. S.J. Stark of General Electric to Mr. Thomas Ippolito, dated June 29, 1981, established proposed completion dates for the Mark I modification program at the DAEC. We are still hopeful of meeting those completion dates. However, since mid-1981, three major uncertainties have arisen. Two of these are analytical concerns which may require NRC resolution before we can be assured that our modifications meet NRC requirements; one is a procurement concern. These issues are:

1. Mechanical fatigue analysis using methods at least as conservative as the Class I piping fatigue analysis rules. A Mark I Owners' Group task force has been established to develop methods of analysis but this effort may result in additional iterations of analysis and additional modification which may impact the final completion schedule.

2. Equipment operability for mechanical components such as pumps and valves. The extent of the problem will not be known until completion of the torus attached piping analysis. At that time, final evaluation methods will be developed and coordinated with the mechanical equipment vendors. This could result in additional analysis and modifications that could have an impact on the final completion schedule.

3. Suppression Pool temperature monitoring system upgrade. It is our interpretation that Regulatory Guide 1.97 and NUREG 0696 requires that this instrumentation system be qualified to Class 1E. At this time we have been unable to identify hardware qualified to our requirements for this modification and we are unable to predict whether the need for equipment qualification will have an impact on the final completion schedule.

A025
S
1/0

Each of the foregoing uncertainties may cause difficulties in meeting the completion dates in the June letter. In addition to the foregoing, there are other uncertainties with regard to the NRC's

interpretation of NUREG-0661. These include alternate SRV analysis, and analyses of condensate oscillation and chugging harmonic phasing, submerged structures, froth impingement loads and torus lateral loads. Our interpretations of NUREG-0661 with respect to these matters were discussed with the NRC during the Mark I Owners' Group meeting on May 22, 1981. Because of their significance, we plan very soon to submit a detailed description of these interpretations for your consideration prior to submittal of our final analysis.

We propose to discuss these matters further with your staff at a meeting in mid-January. If you wish to discuss these matters in the interim, please contact me at your convenience.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/dmh*

cc: NRC Resident Office
K. Eccleston (NRC)