Docket File

OMB-016

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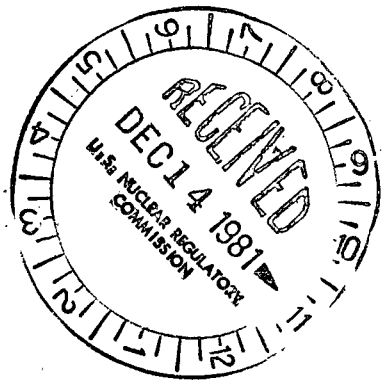
December 8, 1981



Mr. Duane Arnold, President
Iowa Electric Light and Power Company
P. O. Box 351
Cedar Rapids, Iowa 52406

Dear Mr. Arnold:

Ref: Status of NUREG-0737 Items II.F.1.1 and II.F.1.2

NUREG-0737 Items II.F.1.1 and II.F.1.2 require the installation of high range noble gas effluent monitors and provisions for effluent monitoring of radioiodines at accident conditions, respectively, by January 1, 1982. Since a postimplementation review is planned, we are presently reviewing only deviations of the stated NRC positions.

Based on our review of your submittals, no technical deviations from our stated positions are requested to implement NUREG-0737 Items II.F.1.1 and II.F.1.2. If this understanding is not correct, we request formal notification of such within 30 days of the date of this letter.

Your submittal further indicates that you anticipate no problems meeting the implementation date of January 1, 1982 for Items II.F.1.1 and II.F.1.2. You should be aware that Commission approval is required to postpone the implementation date for any NUREG-0737 item at any facility. Therefore, any equipment delivery or installation problems should be brought to our attention as early as possible.

MP 4

Changes to your plant Technical Specifications (TS) will be necessary to fully implement NUREG-0737 Items II.F.1.1 and II.F.1.2. Sample TS pages are provided as Enclosure 1 for your assistance. The schedule for requesting such TS will be determined following our receipt of OMB clearance for all NUREG-0737 items under review pursuant to the Paperwork Reduction Act of 1980.

In these sample TS the action required based on the inoperative status of the accident monitoring instrumentation identified in the Table (3.3.7.5-1) has intentionally been left blank. Upon receipt of OMB clearance it is requested that you propose the action required for your TS changes related to NUREG-0737 Items II.F.1.1 and II.F.1.2. Justification or bases for your proposed action should be included. An acceptable action based on the inoperable status of the noble gas effluent monitors might be:

With the required monitors inoperable, either restore the inoperable Channel(s) to OPERABLE status within 72 hours, or:

1) Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and

2) Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

If you have questions on any portions of this letter, please contact your assigned NRC Project Manager.

Sincerely,

Original Signed by
T. A. Ippolito

Thomas A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

Enclosure:
Sample TS

cc w/enclosure:
See next page

ORB#2
SNorris
12/4/81

OFFICE	ORB#2:DL	ORAB:DL	ORB#3:DL	C-ORB#2:DL			
SURNAME	KEccleston	DVerrelli	MConner	TIppolito			
DATE	12/4/81:cb	12/ /81	12/4/81	12/ /81			

Mr. Duane Arnold
Iowa Electric Light & Power Company

cc:

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Harold F. Reis, Esquire
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U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Rural Route #1
Palo, Iowa 52324

ENCLOSURE 1

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.7.5 The accident monitoring instrumentation channels shown in Table 3.3.7.5-1 shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

ACTION:

a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within days or

b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within hours or

SURVEILLANCE REQUIREMENTS

4.3.7.5 Each of the above required accident monitoring instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.5-1.

TABLE 3.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE
1. Reactor Vessel Pressure	2	1
2. Reactor Vessel Water Level	2	1
3. Suppression Pool Water Level	2	1
4. Suppression Pool Water Temperature	6, 1/sector	6, 1/sector
5. Drywell/Containment Differential Pressure	2	1
6. Drywell Pressure	2	1
7. Drywell and Control Rod Drive Cavity Temperature	2	1
8. Containment Hydrogen Concentration Analyzer and Monitor	2	1
9. Drywell Hydrogen Concentration Analyzer and Monitor	2	1
10. Containment Pressure	2	1
11. Containment Air Temperature	2	1
12. Safety/Relief Valve Tail Pipe Pressure Switch Position Indicators	1/valve	1/valve
13. Containment/Drywell Area Monitors	2#	1#
14. Containment Ventilation Monitor	1	1
15. Off-gas and Radwaste Bldg. Ventilation Monitor	1	1
16. Fuel Handling Area Ventilation Monitor	1	1
17. Turbine Bldg. Ventilation Monitor	1	1
18. Standby Gas Treatment System A & B Exhaust Monitors	1/each	1/each

#Each for containment and drywell.

TABLE 4.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION

	INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1.	Reactor Vessel Pressure	M	R
2.	Reactor Vessel Water Level	M	R
3.	Suppression Pool Water Level	M	R
4.	Suppression Pool Water Temperature	M	R
5.	Drywell/Containment Differential Pressure	M	R
6.	Drywell Pressure	M	R
7.	Drywell and Control Rod Cavity Temperature	M	R
8.	Containment Hydrogen Concentration Analyzer and Monitor	NA	Q*
9.	Drywell Hydrogen Concentration Analyzer and Monitor	NA	Q*
10.	Containment Pressure	M	R
11.	Containment Air Temperature	M	R
12.	Safety/Relief Valve Tail Pipe Pressure Switch Position Indicators	M	R
13.	Containment/Drywell Area Monitors	M	R
14.	Containment Ventilation Monitor	M	R
15.	Off-gas and Radwaste Bldg. Ventilation Monitor	M	R
16.	Fuel Handling Area Ventilation Monitor	M	R
17.	Turbine Bldg. Ventilation Monitor	M	R
18.	Standby Gas Treatment System A & B Exhaust Monitors	M	R

*Using sample gas containing:

a. One volume percent hydrogen, remainder nitrogen.
b. Four volume percent hydrogen, remainder nitrogen.

3/4.3.3.3 SEISMIC INSTRUMENTATION

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10 CFR Part 100. The instrumentation is consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes," April 1974.

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs," February 1972.

3/4.3.3.5 REMOTE SHUTDOWN INSTRUMENTATION

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

3/4.3.3.6 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," December 1980 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November, 1980.