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ACCESSION NBR:8202020364 DOC.DATE: 82/01/29 NOTARIZED: NO DOCKET # FACIL:50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331

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DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards first semiannual rept on environ qualification program for safety=related electrical equipment.

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Iowa Electric Light and Power Company

January 29, 1982 LDR-82-0013

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:

This letter and attachment comprise our first semi-annual report on the status of the Iowa Electric environmental qualification program as outlined in our letter of September 8, 1981, LDR-81-257, in response to the NRC Staff's Safety Evaluation Report(SER) on environmental qualification of safety-related electrical equipment at the Duane Arnold Energy Center. Also, as committed in that letter, this report transmits the equipment qualification summary sheets for all equipment located in harsh environments.

As stated in our letter of September 8, 1981, Iowa Electric recognizes that the success of the overall effort to document environmental qualification of safety-related electrical equipment is dependent upon the development of a comprehensive program to address the identified concerns. This program is being developed by Iowa Electric to specifically address the requirements published to date, yet it is intended to be flexible so that it can readily be adapted to accommodate future changes and requirements. The attached response is based on the program in its current form and the best information that is available to us at this time.

Section II of the attached report provides an update on the status of each of the action items addressed in our letter of September 8, 1981. As a result of additional detailed review of qualification requirements versus qualification capability that was commensurate with this report and based on more well-defined industry and BWR Owners' Group positions on environmental qualification, nine additional action items have been identified and are included in Section II of the attached report. For each new action item, a proposed resolution with date of completion and justification for continued operation are provided.

As outlined in our letter of September 8, 1981, the resolution of all action items may extend beyond the June 30, 1982 date established by Commission directive for resolution of environmental qualification concerns. This extended schedule for resolution also applies to the new action items.

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* 1882 - A CENTURY OF SERVICE - 1982 *

Page 2 Mr. Harold Denton January 29, 1982

Accordingly, this letter, together with the enclosed report, constitutes a supplement to Iowa Electric's application (in Iowa Electric's letter of September 8, 1981) to the Commission for an extension of the June 30, 1982 completion date with respect to the Duane Arnold Energy Center, as follows:

(a) To the date of startup of the Duane Arnold Energy Center following the first refueling after June 30, 1982, now expected to take place in the fall of 1982:

Item II-19b Review Limitorque Valve Operators

(b) To the date of startup of the Duane Arnold Energy Center following the first refueling in 1984, now expected to take place in the spring of 1984:

Item II-22b Requalify or Replace Fenwall Control Units

Item II-23b Requalify or Replace Electrodyne Valve Operators

Item II-24b Replace ASCO Solenoid Valves

Item II-25b Replace Penn Temperature Switches

Item II-26b Requalify or Replace Gulton Industries Company Temperature Elements.

Item II-27b Requalify or Replace Industrial Engineering Equipment Company Temperature Switches

In addition as committed in our letter of September 8, 1981, we have provided the current status of resolution of those action items for which no specific schedule commitment was made at the time of the SER response. This update for each individual item is found in Sections II - 7b, II - 8b and II - 16b of the attached report.

As stated in our letter of September 8, 1981, we have set forth programs which represent our best efforts to complete the qualification of safety-related equipment in accordance with the Commission's directive as promptly as feasible. The completion of these programs is subject to many uncertainties not within the control of Iowa Electric which may impact these programs. Iowa Electric will continue to issue semi-annual reports to the NRC to advise the Commission of the status of these programs or delays, and of any anticipated inability of Iowa Electric to meet the completion dates specified in the attached report.