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 MCGAUGHY, R.W. Iowa Electric Light & Power Co.
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 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits response to 830603 ltr re NUREG-0737, Item II.K.3.18,
 "Automatic Depressurization Sys Logic Mods." Mods
 eliminating high drywell pressure permissive & adding manual
 inhibit switch chosen.

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Iowa Electric Light and Power Company

July 27, 1983
NG-83-2537

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

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
NUREG-0737, Item II.K.3.18 - ADS Logic Modifications

Dear Mr. Denton:

This provides our response to Mr. Domenic Vassallo's letter of June 3, 1983 regarding NUREG-0737, Item II.K.3.18, "ADS Logic Modifications".

In that letter, Mr. Vassallo indicated that the NRC has concluded that the Automatic Depressurization System (ADS) actuation logic at several plants, including the Duane Arnold Energy Center (DAEC), should be modified. We were requested to choose one of two ADS logic modification options which the NRC has judged to be acceptable and to provide a schedule for implementing the modification and proposing appropriate technical specifications.

Iowa Electric and the BWR Owners group have concluded that the current ADS actuation logic, supplemented by the implementation of the function-oriented emergency procedure guidelines, meets the intent of NUREG-0737, Item II.K.3.18. However, we have also concluded that benefits can be derived from a modification of the ADS logic which eliminates the high drywell pressure permissive, and adds a manual inhibit switch (Option 1 of your letter dated June 3, 1983). We have, therefore, chosen to implement this modification at the DAEC.

Current projections indicate that this modification can be completed and appropriate technical specification changes proposed prior to startup from the Cycle 7/8 refueling outage. This modification will be incorporated in Schedule B of the Iowa Electric "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" ("The Plan", Amendment 91 to DPR-49). The final schedule for implementing this modification will be included with our next semi-annual update of "The Plan".

If we can be of further assistance, please advise.

Very truly yours,

8308010336 830727
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