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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331  
 AUTH. NAME: MCGAUGHY, R.W. AUTHOR AFFILIATION: Iowa Electric Light & Power Co.  
 RECIP. NAME: EISENHUT, R.W. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Requests extension to respond to Generic Ltr 83-28 "Required Actions Based on Generic Implication of Salem ATWS Events." After completion of BWR Owners Groups guidelines, response expected by 840229.

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 TITLE: OR Submittal: Inadequate Core Cooling (Item II.F.2) GL 82-28

## NOTES:

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Iowa Electric Light and Power Company

September 2, 1983

NG-83-3104

Darrell G. Eisenhut, Director  
Division of Licensing  
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  
Schedule for Submittals in Response to NRC Generic  
Letter 83-28.

- References:
- 1) Letter, D. G. Eisenhut to All Licensees of Operating Reactors, et.al, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
  - 2) Letter, T. J. Dente to D. G. Eisenhut, "Schedule for Submittals in Response to NRC Generic Letter 83-28," September 2, 1983, BWROG 83-29.

Dear Mr. Eisenhut:

We have reviewed the NRC request for information in Generic Letter 83-28 (Ref. 1) and have determined that additional time will be needed to prepare our response. We are a member of the BWR Owners' Group (BWROG) and are participating in the group's generic evaluation program. In order to best utilize this BWROG effort to prepare a uniform, coordinated response, an extension of time is needed. Therefore, we endorse the BWROG extension request as given in the Reference 2 letter.

We are assessing our plant capabilities with respect to the NRC proposed actions resulting from the Salem events in parallel with the BWROG program. Although we anticipate improvements may be required, a summary of our current assessment for the four NRC-identified areas is as follows:

Post-Trip Review - Post scram reviews are currently required to be conducted with the necessary management review and approval needed prior to restart.

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Mr. Darrell Eisenhut  
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Equipment Classification and Vendor Interface - Procedures are currently in place for controlling testing, maintenance and procurement activities to existing quality classifications.

Post-Maintenance Testing - Procedures are currently in place to assure that post-maintenance testing of safety-related components is required to be performed and that such testing be reviewed for appropriateness before being performed.

Reactor Trip System Reliability - A very high reliability of equipment and systems used to scram the reactor has been demonstrated by operating experience and surveillance testing at our plant.

Because of these existing capabilities and because our BWR plant does not share the design features which failed at the Salem plant, we consider a time extension to have no significant impact on public health and safety.

While participating in the BWROG program, we will evaluate our plant capabilities in more detail. After completion of the BWROG-developed guidelines for assessing plant capabilities in response to Reference 1, we will develop the NRC requested documentation of our plant assessment and submit this response to the NRC by February 29, 1984.

Please contact this office if you require further information as to our plans and schedules.

Very truly yours,



Richard W. McGaughy  
Manager, Nuclear Division

RWM/RAB/dmh\*

cc: R. Browning  
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S. Tuthill  
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NRC Resident Office  
Commitment Control No: 83-0217