REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8608190107 DOC. DATE: 86/08/15 NOTARIZED: NO DOCKET #
FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
AUTH. NAME AUTHOR AFFILIATION
MCGAUGHY, R. W. Iowa Electric Light & Power Co.
RECIP. NAME RECIPIENT AFFILIATION
DENTON, H. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Forwards revised Relief Requests SN-002 & HT-013 for second 10-yr inservice insp plan & addl Relief Request NDE-005. Relief Request NDE-005 should be included in second 10-yr inservice insp plan review.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
TITLE: OR Submittal: Inservice Inspection/Testing

NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
	BWR ADTS		1	1	BWR EB		1	1
	BWR PD2 LA		1	0	BWR PD2 PD	01	5	5
	THADANI, M		1	1				
INTERNAL:	ADM/LFMB		1	0	AEOD/PTB		1	1
	ELD/HDS2		1	0	~~NRR/DSRO/EIB~~		1	1
	NRR/TAMB		1	1	REG FILE	04	1	1
	RGN3		1	1				
EXTERNAL:	LPDR	03	1	1	NRC PDR	02	1	1
	NSIC	05	1	1				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 16

Iowa Electric Light and Power Company

August 15, 1986
NG-86-2750

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
Second 10-Year Inservice Inspection Plan
Reference: 1) Letter, R. McGaughy to H. Denton, dated May 1, 1985 (NG-85-1911)
2) Letter, R. McGaughy to H. Denton, dated May 14, 1986 (NG-86-1692)
File: A-107a, A-286

Dear Mr. Denton:

In a July 17, 1986 conference call with members of your staff, several questions were raised on relief requests submitted for our second 10-year inservice inspection interval (References 1 and 2). The questions involved Relief Requests SN-002, HT-013 and NDE-004.

Attachment 1 provides revised Relief Requests SN-002 and HT-013. These revised relief requests provide a more detailed basis for relief from the ASME Section XI Code, 1980 Edition with addenda through Winter 1981. Also included in this attachment is the deletion of Relief Request NDE-004. Because the ISI boundaries for the DAEC were developed using the guidance issued in 10 CFR 50, Regulatory Guide 1.26 and Standard Review Plan 3.2.2, we do not feel that relief is necessary for our boundary classifications.

This letter also transmits, in Attachment 2, an additional request for relief (NDE-005) that was recently identified. We request that Relief Request NDE-005 be included in your review of our second 10-year Inservice Inspection Plan.

A047
1/1

Should you have any further questions, please contact this office.

Very truly yours,

Richard W. McGaughy
Manager, Nuclear Division

RWM/SAR/ta*

Attachments: 1) Revised Relief Requests
2) Relief Request NDE-005

cc: S. Reith
L. Liu
L. Root
M. Thadani
NRC Resident Office
H. McLamb, Iowa Bureau of Boiler Inspection
Commitment Control No. 86-0288

DUANE ARNOLD ENERGY CENTER
TEN-YEAR EXAMINATION SUMMARY
ASME SECTION XI SYSTEMS

MAJOR ITEM: REQUEST FOR RELIEF NO. SN-002, Rev 1
TABLE: SECTION 10
-REQUEST FOR EXAMINATION RELIEF- PAGE 1 OF 1

COMPONENT OR ITEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
HYDRAULIC AND MECHANICAL-TYPE SNUBBERS	ALL	---	F-C	NA

CODE REQUIREMENTS

(IWF-5400(c)) snubbers that fail the inservice tests of (b) above shall be repaired in accordance with IWF-4000 and retested. An additional sample of 10% of the total number of snubbers shall also be tested at that time.

BASIS FOR RELIEF

DAEC Technical Specifications require functional testing equivalent to that required by IWF-5400 at 18-month intervals vice each period (40 months) with a failure retest requirement of 5%. These requirements have been approved by the NRC and are considered to provide adequate assurance of snubber operability.

Amendment No. 113 to the DAEC Operating License, dated March 12, 1985, revised the Technical Specifications to reduce the retest requirement from 10% to 5%. The original 10% retest requirement was based on the absence of a suitable snubber failure data base. Subsequently, the ASME OM-4 group developed a sampling plan which requires that only 50% of the initial sample size (10%) need be tested for each failed snubber. Through the issuance of Amendment No. 113, the NRC found this ASME position acceptable for the DAEC snubber testing program.

As stated above, the DAEC presently tests a representative snubber sample of 10% at intervals of 18 months. ASME Section XI, IWF-5400 requires testing of a representative snubber sample of 10% at 40 months. Thus, the DAEC tests at least 20% of its safety related snubbers during the ASME Code test interval. Considering this, we feel the Iowa Electric sampling plan exceeds the testing requirements of ASME Section XI and satisfactorily meets the ASME OM-4 resampling plan.

ALTERNATE EXAMINATION

Iowa Electric will conduct inspection and testing in accordance with DAEC Technical Specification 4.6.H.

SCHEDULE FOR IMPLEMENTATION

NOVEMBER 1, 1985 -START OF SECOND INTERVAL-

DUANE ARNOLD ENERGY CENTER
TEN-YEAR EXAMINATION SUMMARY
ASME SECTION XI SYSTEMS

MAJOR ITEM: REQUEST FOR RELIEF NO. HT-013, Rev 1
TABLE: SECTION 10
-REQUEST FOR EXAMINATION RELIEF-
PAGE 1 OF 1

COMPONENT OR ITEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
SYSTEM: Residual Heat Removal	2	---	C-H	C7.30 C7.40

A piping segment (8-HBB-25) approximately 51 feet in length downstream of fuel pool cooling cross-connect valve V-34-1 that is embedded within a concrete wall. Refer to P&IDs: M-119, M-120 and M-134.

CODE REQUIREMENT

The pressure retaining components within the boundary of each system specified in the examination categories of Table IWC-2500-1 shall be pressure tested and examined in accordance with Table IWC-2500-1.

BASIS FOR RELIEF

There is no practical means of inspecting the embedded portion of piping. IWA-5244(a) requires either a leakage test that determines the rate of pressure loss or a test that determines the change in flow between the ends of the buried components be performed for nonredundant buried components. Performance of either test is deemed impractical at the DAEC for the reasons stated below.

Performance of a leakage test that determines the rate of pressure loss would require the closure of 8 valves. These valves, MO-2011 (18 in.), MO-2016 (18 in.), MO-1920 (18 in.), MO-1912 (18 in.), MO-1909 (18 in.), V-19-125 (3/4 in.) or V-19-55 (3/4 in.), V-19-27 (2 in.), and V-34-1 (8 in.), are not Category A valves and therefore have no seat leakage requirements. While the owner is responsible for determining an acceptable pressure loss, the collective seat leakage through this combination of valves would make it impractical to attempt to measure any possible leakage in this 51-foot length of concrete embedded piping.

Performance of a test that determines change in flow between the ends of the buried components is also impractical. This is due to the same collective seat leakage problems described above for the rate of pressure loss test. This flow test would require the closure of valve V-34-2 (8 in.) and the same valves mentioned above with the exception of V-34-1.

We believe it is impractical to expect the valves involved with either a pressure drop or a change in flow test to provide a test boundary capable of allowing a valid measurement of leakage from the subject pipe segment.

ALTERNATE EXAMINATION

The outer extremities of the pipe segment will be inspected for any indication of leakage within the wall while pressurized in accordance with the requirements of Table IWC-2500-1.

SCHEDULE FOR IMPLEMENTATION

NOVEMBER 1, 1985 -START OF SECOND INSPECTION INTERVAL-

DUANE ARNOLD ENERGY CENTER
TEN-YEAR EXAMINATION SUMMARY
ASME SECTION XI SYSTEMS

MAJOR ITEM: REQUEST FOR RELIEF NO. NDE-004
TABLE: SECTION 4.2
-REQUEST FOR EXAMINATION RELIEF- PAGE 1 OF 1

COMPONENT OR ITEM		ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
SYSTEM:	Code Classification Boundary	3	3.1 3.2	D-A D-B D-C	D1.10-D1.60 D2.10-D2.60 D3.10-D3.60

WITHDRAWN 8/86

DUANE ARNOLD ENERGY CENTER
TEN-YEAR EXAMINATION SUMMARY
ASME SECTION XI SYSTEMS

MAJOR ITEM: REQUEST FOR RELIEF NO. NDE-005
TABLE: SECTION 4.2
-REQUEST FOR EXAMINATION RELIEF-
PAGE 1 OF 1

COMPONENT OR ITEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
SYSTEM: HPCI Pump Discharge	2	---	C-C	C3.20
			F-C	F3.30
Lugs 1-8 on Support HPB-CE-68 (EBB-5-SR-9)				

CODE REQUIREMENT

IWC-2500-1 requires a surface exam of 100% of each welded attachment.

IWF-2500-1 requires a visual, VT-3 examination of the welded attachment.

BASIS FOR RELIEF

The support is a trapeze support for a vertical section of piping and is located in a penetration.

The location of the support makes it inaccessible for performing a surface or visual examination of the lugs.

ALTERNATE EXAMINATION

The accessible portions of the support will be visually inspected.