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 MCGAUGHY, R. W. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Responds to request for addl info re reliability of
 mechanical level indication equipment discussed in Generic
 Ltr 84-23. Procedures used to gather data for earlier
 assessment confirmed. High reliability remains valid.

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Iowa Electric Light and Power Company

January 30, 1987
NG-87-0247

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

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to Request for Additional
Information Regarding the Reliability of
Mechanical Level Indication Equipment
Discussed in Generic Letter 84-23

Reference: Letter, R. McGaughy to H. Denton, "Generic
Letter 84-23: Reactor Vessel Water Level
Instrumentation in BWRs," NG-85-2079,
May 3, 1985

File: A-101b

Dear Mr. Denton:

Generic Letter 84-23 required licensees to review their operating experience with the mechanical level indication equipment used to measure the water level within the reactor vessel and to replace this equipment with analog trip units if operating experience did not confirm high reliability of the mechanical devices. In the referenced letter we stated that we had performed the requested review and that our operating experience confirmed that the reliability of our existing mechanical equipment was indeed high. However, due to the concerns raised in I&E Bulletin 86-02 regarding the failure of another licensee's surveillance program to detect a problem with its mechanical water level switches, your staff has requested that we review our surveillance procedures to assure ourselves that the data used to make our earlier reliability assessment is valid. We have reviewed our surveillance procedures for the Technical Specification-required reactor water level instruments which were used to gather the data for our response to Generic Letter 84-23. We have confirmed that our procedures used to gather the data for our earlier assessment, as well as presently, require "as-found" data to be recorded prior to the recalibration of these instruments and therefore, our earlier assessment of high reliability remains valid.

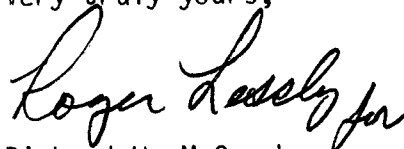
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Mr. Harold Denton
January 30, 1987
NG-87-0247
Page Two

Please contact this office if you require further information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Roger L. McGaughy", written over the typed name.

Richard W. McGaughy
Manager, Nuclear Division

RWM/RAB/pjv*

cc: T. Browning
L. Liu
L. Root
B. Gilbert
NRC Resident Office
Commitment Control No. 860413