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

SUBJECT: Responds to NRC 850423 request for addl info re Generic Ltr
 83-28.Reactor trip function components provided by NSSS
 vendor.GE customer svc organization info program described
 in util 840229 response.

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 TITLE: OR/Licensing Submittal: Salem ATWS Events GL-83-28

NOTES:

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Iowa Electric Light and Power Company

June 28, 1985
NG-85-2839

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
Response to Request for Additional
Information Regarding Generic Letter 83-28
(Salem ATWS)
Reference: Letter, D.B. Vassallo to L. Liu, "Request
for Additional Information Following
Preliminary Staff Review of Licensee
Responses to Generic Letter 83-28," April 23,
1985.
File: A-107d, A-224, A-107a

Dear Mr. Denton:

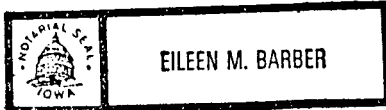
The attached responses are provided to your staff's request for additional information (Ref.) regarding our original submittal for Generic Letter 83-28.

Please contact this office if you require further information.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY

Richard W. McGaughy
Richard W. McGaughy
Manager, Nuclear Division



Subscribed and sworn to Before Me on
this 28th day of June 1985.

Eileen M. Barber
Notary Public in and for the State of Iowa

RWM/RAB/rh*

Attachment: Iowa Electric Responses to NRC Request for Additional
Information Regarding Generic Letter 83-28 (Salem ATWS)

cc: R. Browning
L. Liu
S. Tuthill
M. Thadani
NRC Resident
Commitment Control No.: 850125

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IOWA ELECTRIC RESPONSES TO NRC
REQUEST FOR ADDITIONAL INFORMATION
REGARDING GENERIC LETTER 83-28 (SALEM ATWS)

NRC Request:

Item 2.1 (Part 2) - Incomplete

Licensee needs to show that under his vendor interface program periodic contact is made with vendors of RTS components to assure that vendor technical information is kept current, complete, and controlled over the life of the plant. Information should also define the division of responsibilities between licensee and the nuclear and non-nuclear divisions and their vendors that provide service to assure control over maintenance and test procedures.

Iowa Electric Response:

As the Reactor Trip Function (RTF) components fall within the scope of supply of our NSSS vendor, General Electric (GE), we rely primarily upon the GE Customer Services Organization for vendor information regarding RTF components. A detailed description of the GE information program was provided in our original response (Ref. 1), as well as our in-house program for reviewing vendor information regarding RTF components. The description also includes the feedback mechanisms and periodic contact aspects of our program. Therefore, our original response provides the requested information.

NRC Request:

Item 2.2.2 - Incomplete

The licensee's response is based on the NUTAC report. The licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at DAEC. The staff found that the NUTAC program fails to address the concern about establishing and maintaining an interface between all safety-related equipment vendors and the utility¹. Accordingly, the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet the elements of this concern.

Iowa Electric Response:

Iowa Electric's program for maintaining and controlling vendor information was described in our original response to Generic Letter 83-28, (Ref. 1). This program is based upon the Vendor Equipment Technical Information Program (VETIP) developed by the INPO Nuclear Utility Task Action Committee (NUTAC) and is described in the March 1984 NUTAC document (Ref. 2). Our latest schedule for implementing the VETIP program at the DAEC was provided in our letter dated April 30th of this year (Ref. 3).

We feel that our program fully addresses the concerns raised in Item 2.2.2 of the Generic Letter and therefore request that the NRC re-evaluate the VETIP program previously submitted.

NRC Request:

Item 4.5.3 - Incomplete

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the Technical Specification surveillance requirements. The licensee needs to address this conclusion.

Regarding the scram pilot valves (including all initiating circuitry), the licensee needs to provide the results of a review of existing or proposed intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response shall show how these intervals result in high reactor trip system availability and present proposed Technical Specification changes for staff review.

The staff has just received the BWR Owners Group response to Item 4.5.3 (NEDC-30844). If the licensee intends to formally endorse the Owners Group response, the licensee should delay his plant-specific response to Item 4.5.3 until after the staff completes its review of the Owners Group response,

Iowa Electric Response:

We committed to perform off-line testing of the back-up scram valves each refueling outage in our original response, (Ref. 1). We subsequently informed you in our April 30, 1985 letter (Ref. 3) that such testing procedures had been written and that the testing would be performed prior to start-up from the present refueling outage.

Given that our primary scram system is highly reliable and that a diverse Alternate Rod Injection (ARI) system is required to be installed per 10CFR50.62 (ATWS Rule), we feel that requiring such testing of back-up scram valves by Technical Specifications is not appropriate. We, therefore, request that the NRC reconsider this requirement.

In our April 30 letter (Ref. 3), we supplemented our original response to Item 4.5.3 by endorsing the BWR Owner's Group report on RTF component availability (Ref. 4). We, therefore, will delay our response to the staff's request for additional information, pending NRC review of the Owners Group report.

References:

- 1) Letter, R. W. McGaughy to H. Denton, "Generic Letter 83-28: 'Required Actions Based on Generic Implications of Salem ATWS Events'," NG-84-0825, February 29, 1984.

- 2) Vendor Equipment Technical Information Program, Developed by Nuclear Utility Task Action Committee for Generic Letter 83-28, Section 2.2.2, INPO 84-010, March, 1984.
- 3) Letter, R. W. McGaughy to H. Denton, "Statement of Confirmation of Generic Letter 83-28 Item 3.1.2 Regarding Post-Maintenance Testing of Reactor Trip Function Components and Item 4.5.2 Regarding Functional Testing of Backup Scram Valves", NG-85-1838, April 30, 1985.
- 4) Letter, J. M. Fulton to D. G. Eisenhut, "BWR Owners' Group Response to Generic Letter 83-28, Item 4.5.3," BWR0G-8505, January 31, 1985.