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DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits schedule for upgrades to plant instrumentation per requirements of Suppl 1 to NUREG=0737, Rev 2 to Reg Guide 1.97 & Generic Ltr 84=23. Mods will not be fully implemented util 1988 cycle 9/10 refueling outage.

NOTES:

DL:02/22/74

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	RECIPIENT	COPIE	S	RECIPIENT	COPI	ES
	ID CODE/NAME	LTTR	ENCL	ID CODE/NAME	LTTR	ENCL
N	RR ORB2 BC	7	7			
INTERNAL: A	DM/LFMB	1	0	IE/DEPER/EPB	3	3
N	RR PAULSON, W	1	1	NRR/DHFS/HFEB	5	5
N	RR/DHFS/PSRB	2	2	NRR/DL/ORAB	1	1
N	RR/DL/ORB5	5	5	NRR/DSI/CPB	1	1
	RR/DSI/ICSB	1	1	NRR/DSI/METB	1	1
	RR-LOSI LRAB	ĩ	1	NRR/DSI/RSB	1	1 4
	EG FILES	i ·	1	RGN3	· <b>1</b>	1.
EXTERNAL: 2	4 X -	1	1	LPDR.	1	1.
N	RC: PDR:	1.	1	NSIC	1	1.

## Iowa Electric Light and Power Company October 16, 1985 NG-85-4481

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

Plans and Schedules for Implementation of Plant Instrumentation Upgrades for Regulatory

Guide 1.97 and Generic Letter 84-23

Reference:

1) Letter, R. McGaughy to H. Denton, "Regulatory Guide 1.97," NG-85-2423,

July 3, 1985

2) 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-107d, A-370

Dear Mr. Denton:

In our original response to Item 6.2 of Supplement 1 to NUREG-0737 (Reference 1), we stated that certain enhancements to existing plant instrumentation would be required in order to meet the requirements of Supplement 1 with respect to Regulatory Guide 1.97 (Rev. 2). The purpose of this letter is to inform you of our schedule for making these upgrades. The attachment to this letter provides an itemized list of the currently planned modifications with corresponding completion dates. The finalized list of modifications is subject to NRC approval of our Reference 1 submittal, as exceptions were taken to certain positions within Reg. Guide 1.97.

One of the Reg. Guide 1.97 variables deals with reactor water level instrumentation, which is also the subject of Generic Letter (GL) 84-23. In our last response to the generic letter (Reference 2), we stated that we were investigating several new alternatives to the concerns raised in GL 84-23. These alternatives, which are generic to a number of BWRs, involve complex engineering and have high developmental costs. Therefore the issue was brought before the BWR Owners' Group (BWROG) for consideration. As a result, we have joined with other utilities, under the auspices of the BWR Owners' Group (BWROG), to investigate engineering alternatives. This BWROG committee's current estimate for completing the evaluation of these alternatives is the end of the second quarter of 1986.

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As stated previously (Reference 2), we do not expect to fully implement these modifications until our Cycle 9/10 Refueling Outage, currently scheduled for the fall of 1988. We will keep you informed of our final plans and schedules as they are developed, through our semiannual reports on our Integrated Plan.

Please contact this office if you require further information regarding this matter.

Very truly yours,

Richard W. McGaughy

Manager, Nuclear Division

RWM/RAB/ta\*

Attachment: Regulatory Guide 1.97 Instrumentation Upgrades

cc: R. Browning

L. Liu

S. Tuthill

M. Thadani

NRC Resident Office

Commitment Control Nos. 830330 and 850120

## REGULATORY GUIDE 1.97 INSTRUMENTATION UPGRADES

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Identifier	Variable	Modification	Completion Date
B-4	Reactor Water Level	Install Upgraded Instrumentation	RFOTC10*
B-6	Reactor Pressure	Upgrade 1E Power Supply	RFOTC10*
B-7	Drywell Pressure	Upgrade 1E Power Supply Reroute Cables (Divisional Separation)	RFOTC10*
B-8	Drywell Sump Level	Reroute Cables (Divisional Separation)	RFOTC10*
B-10	Containment Isolation Valve Position	Upgrade 1E Power Supply, Reroute Cables (Divisional Separation), Upgrade to Category 1	RFOTC10*
C-5	Primary Containment Area Radiation	Upgrade 1E Power Supply	RFOTC10*
C-7	Suppression Pool Water Level	Upgrade 1E Power Supply	RFOTC10*
C-10	Primary Containment Pressure	Upgrade 1E Power Supply	RFOTC10*
C-11	Containment and Drywell Hydrogen Concentration	Upgrade 1E Power Supply	RFOTC10*
C-12	Containment and Drywell Oxygen	Upgrade 1E Power Supply	RFOTC10*
D-4	Drywell Pressure	Upgrade 1E Power Supply	RFOTC10*
D-6	Suppression Pool Water Temperature	Reroute Cable (Divisional Separation)	RFOTC10*
D-7	Drywell Atmosphere Temperature	Reroute Cable (Divisional Separation)	RFOTC10*
D-9	MSIV Leakage Control System Pressure	Upgrade to Category 1	RFOTC10*
D-16	LPCI System Flow	Reroute Cable (Divisional Separation)	RFOTC10*
D-24	Emergency Ventilation Damper Position	Reroute Cable (Divisional Separation)	RFOTC10*
E-1	Primary Containment Area Radiation - High Range	Upgrade 1E Power Supply	RFOTC10*

<sup>\*</sup>RFOTC10 = Refueling Outage Cycle 10