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 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 explanation for conclusion that inflatable seals within containment purge & vent valves & torus-to-reactor bldg vacuum breaker sys are not credible sources of oxygen in-leakage, per Generic Ltr 84-09.

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Iowa Electric Light and Power Company

December 6, 1985

NG-85-4974

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 84-09:
Recombiner Capability Requirements of 10 CFR
50.44(c)(3)(ii)

Reference: 1) Letter, R. McGaughy to H. Denton,
same subject, NG-85-0571, February 15,
1985
2) Letter, R. McGaughy to H. Denton,
"Response to Generic Letter 84-09:
Recombiner Capability Requirements of
10 CFR 50.44(c)(3)(ii)," NG-84-3175,
July 27, 1984

File: A-107b, A-107d

Dear Mr. Denton:

Attached you will find the explanation for our conclusion that certain inflatable seals within our containment purge and vent valves and torus-to-reactor building vacuum breaker system are not credible sources of oxygen inleakage with respect to Generic Letter (GL) 84-09. This information is being provided in response to a verbal request from your staff regarding our latest response to GL 84-09 (Reference 1). The necessary procedure changes described in the attachment will be implemented by the end of May 1986.

Based upon our previous submittals (References 1 and 2) and supplemented by the attached information, we conclude that the criteria of GL 84-09 are satisfied. The Duane Arnold Energy Center (DAEC) does not rely upon purge/repressurization systems as the primary means of hydrogen control and, therefore, a hydrogen recombiner capability is not required for the DAEC.

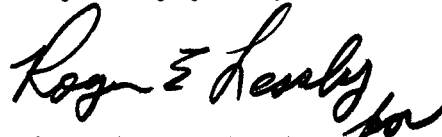
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E. Reeves *1 1*

Mr. Harold Denton
December 6, 1985
NG-85-4974
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Please contact this office if you require further information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Rog E. McGaughy".

Richard W. McGaughy
Manager, Nuclear Division

RWM/RAB/ta*

Attachment: Justification for the Current Purge and Vent Valve T-Ring Seal
Pressurization System

cc: R. Browning
L. Liu
L. Root
M. Thadani
NRC Resident Office