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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH. NAME AUTHOR AFFILIATION
 MCGAUGHEY, R.W. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards requests for relief from requirements of ASME Code
 Section XI, 1974 Edition-1975 Summer Addenda due to
 impracticality of performing functions during inservice insp
 sys hydrostatic pressure tests. P&IDs also encl. Fee paid.

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TITLE: OR Submittal: Inservice Inspection/Testing

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Iowa Electric Light and Power Company

July 1, 1985

NG-85-2258

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
ASME Section XI Relief Requests
Reference: Letter, R.W. McGaughy (Iowa Electric) to
H.R. Denton, dated February 28, 1985
(NG-85-0820)
File: A-286

Dear Mr. Denton:

Pursuant to 10 CFR 50.55a(g)(5)(iii) and 10 CFR 50.12, Iowa Electric Light and Power Company requests relief from requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition through the 1975 Summer Addenda.

During the performance of Duane Arnold Energy Center's (DAEC) Inservice Inspection system hydrostatic pressure tests, it was found to be impractical to perform certain Code requirements. We therefore request relief from these requirements for the various systems and components during the performance of the DAEC inservice inspection plan. The attachments to this letter provide the bases for the relief sought and describe alternate testing methodologies.

Our February 28, 1985, submittal included requests for relief numbers 8 through 12. Subsequent to this, we successfully hydrotested the Stand-by Liquid Control System (SBLCS) which was listed in relief request number 9. Therefore, we have revised the previous request to delete references to the SBLCS and request that relief request number 9, Rev. 1, supersede the original.

To aid in your review of these requests for relief, four sets of Piping and Instrumentation Diagrams (P&IDs) are included for your information.

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Drawing
Rev. 1
M. J. Hadam - 3

Mr. Harold Denton
July 1, 1985
NG-85-2258
Page Two

In accordance with the requirements of 10 CFR 170, we are enclosing the required application fee of \$150.

Should you have any questions, please contact this office.

Very truly yours,



Richard W. McGaughy
Manager, Nuclear Division

RWM/SAR/ta*

Attachments: Relief Requests Nos. 9, Rev. 1, and 13 through 25 from ASME B&PV Code Section XI

cc: S. Reith
K. Howard
L. Liu
S. Tuthill
M. Thadani
NRC Resident Office
W. Larson (Iowa Bureau of Boiler Inspection)

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 9, REV. 1

SYSTEMS:

Control Rod Drive (CRD)
Residual Heat Removal (RHR)
Reactor Core Isolation Cooling (RCIC)
High-Pressure Coolant Injection (HPCI)
Core Spray (CS)

COMPONENTS:

CRD Pump and discharge piping to first isolation valve
RHR System Pumps and discharge piping to first isolation valve
RCIC System Pump and discharge piping to first isolation valve
HPCI System Pump and discharge piping to first isolation valve
Core Spray System Pumps and discharge piping to first isolation valve

CODE CLASS: 2

CODE TEST REQUIREMENT:

ASME Section XI 1974 through Summer 1975 addenda, paragraph IWC-5220(a) states:

"The system hydrostatic test pressure shall be at least 1.25 times the system design pressure (P_d) and conducted at a test temperature not less than 100°F except as may be required to meet the test temperature requirements of IWA-5230."

BASIS FOR RELIEF:

The subject pumps are centrifugal pumps, thus the portions of the pump discharge lines up to the first isolation valve cannot be isolated from the pump suction. Therefore, if the discharge piping were pressurized to the full required test pressure the suction piping would be subjected to a pressure far in excess of its design with the potential for permanent damage to piping and components.

In support of this position, ASME Section XI, paragraph IWA-5224(d) (1980 Ed.) provides relief for this specific case. This paragraph states:

"Where the respective system primary pressure ratings on the suction and discharge side of the system pumps differ, the

system test boundary shall be divided into two separate boundaries (such as suction side and discharge side test boundaries). In the case of positive displacement pumps, the boundary interface shall be considered as the pump. In the case of centrifugal pumps, the boundary interface shall be the first shutoff valve on the discharge side of the pump."

The 1980 Edition of ASME Section XI is the latest code approved by the NRC. Therefore, Iowa Electric's proposed testing provides a degree of operability that is currently prescribed by the ASME and the NRC.

ALTERNATE TESTING:

For centrifugal pumps, the test pressure for the pump discharge and associated piping extending to the first shutoff valve on the discharge side of the pump shall be the same as that required for the piping and components on the suction side of the pump. The system test boundary for the pump suction piping shall likewise extend to the first shutoff valve on the discharge side of the pump. In addition, the pump discharge piping and components will be routinely inspected for leaks during system functional testing which is done at or near normal operating pressures.

CONCLUSION:

Based upon the foregoing information, in conjunction with the alternative testing methodology, and as precedence has been established in IWA-5224(d) (1980 Edition), Iowa Electric believes the proposed relief request should be granted.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 13

SYSTEMS: Various

COMPONENTS: Unisolable portions of the nuclear steam supply system that are classified as Class 2. Refer to P&IDs No. M-114, M-115, M-116, M-121, M-122, and M-124

CODE CLASS: 2

CODE TEST REQUIREMENT:

The system hydrostatic test pressure shall be at least 1.25 times the system design pressure for systems with design temperature above 200°F.

BASIS FOR RELIEF:

In several instances there are class breaks between Class 1 and Class 2 piping without any means for isolation between the two. Testing the Class 2 piping and components at a test pressure of 1.25 times their respective design pressures would require the pressure in the reactor vessel to exceed the maximum allowable.

ALTERNATE EXAMINATION:

Class 2 piping that cannot be isolated from the Class 1 piping to which it is connected, will be tested in conjunction with the Class 1 test.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 14

SYSTEM: Various

COMPONENTS: Piping and components included in the system hydrostatic test boundary.

CODE CLASS: 2

CODE TEST REQUIREMENT:

The system hydrostatic test pressure shall be at least 1.25 times the system design pressure. (IWC-5220)

BASIS FOR RELIEF:

Unisolable portions of the various systems within the system hydrostatic test boundary are located throughout the plant such that there are potential variations in elevation within the boundaries that would result in test pressure variations in excess of six (6) percent of the test pressure. It is an Iowa Electric policy to limit the test pressure imposed on system components to 106% of the specified test pressure (as required by Paragraph IWA-5265(b) of the 1980 Code). Thus, due to the effects of static head, portions of piping at higher elevations will be subjected to a test pressure lower than that specified. There is no practical method for isolating the piping segments to achieve the required test pressure at all elevations.

ALTERNATE EXAMINATION:

Hydrostatic testing of Class 2 system piping and associated components will be conducted at a nominal minimum pressure equivalent to 1.25 times the system design pressure at the lowest point in the hydrotest boundary.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 15

SYSTEM: Various

COMPONENTS: Piping and components included in the system hydrostatic test boundary.

CODE CLASS: 3

CODE TEST REQUIREMENT:

The system test pressure shall be at least 1.10 times the system design pressure. (IWD-5200)

BASIS FOR RELIEF:

Unisolable portions of the various systems within the system hydrostatic test boundary are located throughout the plant such that there are potential variations in elevation within the boundaries that would result in test pressure variations in excess of six (6) percent of the test pressure. It is an Iowa Electric policy to limit the test pressure imposed on system components to 106% of the specified test pressure (as required by Paragraph IWA-5265(b) of the 1980 Edition of the ASME Section XI Code). Thus, due to the effects of static head, portions of piping at higher elevations will be subjected to a test pressure lower than that specified. There is no practical method for isolating the piping segments to achieve the required test pressure at all elevations.

ALTERNATE EXAMINATION:

Hydrostatic testing of Class 3 system piping and associated components will be conducted at a nominal minimum pressure equivalent to 1.10 times the system design pressure at the lowest point in the hydrotest boundary.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
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ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 16

SYSTEMS: Emergency Service Water (ESW)
RHR Service Water

COMPONENTS: Piping and components downstream of PSE 2079A and PSE 2079B.
Refer to P&IDs M-113 and M-142

CODE CLASS: 3

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

In the case of buried components (e.g., underground piping), valves shall be provided to permit isolation of the buried portions of piping for the purpose of conducting a system pressure test in lieu of the visual examination. A loss of system pressure during the test shall constitute evidence of component leakage.

BASIS FOR RELIEF:

Much of the piping identified above is buried underground and is bounded by large (24-inch) butterfly valves that were not originally specified to be leak-tight. Additionally, since the leak-tight integrity of these valves is not important from operational or safety viewpoints, it is highly unlikely that they could hold hydrostatic pressure to a sufficient extent to permit performance of a hydrotest and certainly not for the pressure drop test required for underground piping.

ALTERNATE EXAMINATION:

During system functional testing, operation will be observed to verify that return flow is not impaired through this section of piping. This agrees with the requirements as stated in ASME B&PV Code, Section XI, 1980 Edition, Winter 1981 Addenda, Paragraph IWA-5244(c).

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
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ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 17

SYSTEM: Reactor Recirculation

COMPONENTS: Recirculation pump seal leak detection sensing line.
Refer to P&ID M-116

CODE CLASS: 3

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

BASIS FOR RELIEF:

This piping is a pressure sensing instrument line leading from the recirculation pump backup seal and there are no isolation valves between the seal and the piping; thus, there is no practical method of testing this piping. These sections of piping are pressurized only in the event of a failure of a Number 1 recirc pump seal which would be indicated by an alarm in the Control Room. If this did occur, it is likely that the plant would be promptly shut down and cooled down to effect repairs to the seal.

ALTERNATE EXAMINATION:

None

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 18

SYSTEM: Control Rod Drive (CRD)

COMPONENTS: Insert and withdrawal lines to the control rod drive mechanisms.
Refer to P&IDs M-117 and M-118

CODE CLASS: 2

CODE TEST REQUIREMENT:

The system hydrostatic test pressure shall be at least 1.25 times the system design pressure. (IWC-5220)

BASIS FOR RELIEF:

The CRD insert and withdrawal piping is not isolable from the reactor vessel by way of designed leakage through the CRD mechanism. Testing at a test pressure of 1.25 times the system design pressure for the CRD insert and withdrawal lines would require the pressure in the reactor vessel to exceed the maximum allowable.

ALTERNATE EXAMINATION:

The CRD insert and withdrawal piping will be inspected while the Class 1 hydrostatic test is being conducted at the pressure designated for the Class 1 test.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
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ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 19

SYSTEM: Control Rod Drive (CRD)

COMPONENTS: Piping and components associated with the CRD hydraulic control units between valves CV-1850 and V-18-1453 through V-18-1541. Refer to P&IDs M-117 and M-118

CODE CLASS: 2

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

BASIS FOR RELIEF:

There are no connection points or taps between these valves; thus, there is no practical method for pressure testing the section of piping between these valves on each hydraulic control unit.

ALTERNATE EXAMINATION:

None

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
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ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 20

SYSTEM: River Water Supply

COMPONENTS: Piping and components between the check valves and the stop valves at the discharge of each river water supply pump.

V-29-1 and V-29-2

V-29-3 and V-29-4

V-29-5 and V-29-6

V-29-7 and V-29-8

Refer to P&ID M-129

CODE CLASS: 3

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

BASIS FOR RELIEF:

There are no connection points or pressure taps between each of these pairs of valves; thus, there is no practical method of pressurizing the section of piping and components between these valves to conduct the required hydrostatic pressure test.

ALTERNATE EXAMINATION:

None

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 21

SYSTEM: High Pressure Coolant Injection (HPCI)

COMPONENTS: Piping and components between check valve V-23-4 and M0-2300.
Refer to P&ID M-123

CODE CLASS: 2

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

BASIS FOR RELIEF:

There are no connection points or pressure taps between these valves; thus, there is no practical method for pressurizing the section of piping between these two valves to the required test pressure.

ALTERNATE EXAMINATION:

None

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
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ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 22

SYSTEM: Core Spray

COMPONENTS: Underground piping and components associated with the core spray suction from the condensate storage tanks between valves V-21-1, V-21-2, V-09-25, V-09-26, and M0-2500. Refer to P&IDs M-109, M-121, and M-125

CODE CLASS: 3

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

In the case of buried components (e.g., underground piping), valves shall be provided to permit isolation of the buried portions of piping for the purpose of conducting a system pressure test in lieu of the visual examination. A loss of system pressure during the test shall constitute evidence of component leakage.

BASIS FOR RELIEF:

Portions of the piping identified above are underground and are bounded by two large (14-inch) butterfly valves that were not originally specified to be leak-tight. Additionally, since the leak-tight integrity of these valves' seats is not important from operational or safety viewpoints, it is highly unlikely that they could hold hydrostatic pressure to a sufficient extent to permit performance of the pressure drop test required for underground piping.

ALTERNATE EXAMINATION:

None

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 23

SYSTEM: High Pressure Coolant Injection (HPCI)

COMPONENTS: Piping and components associated with the HPCI suction from the condensate storage tanks between valves M0-2300, V-09-27, and V-09-28. Refer to P&IDs M-109 and M-123

CODE CLASS: 3

CODE TEST REQUIREMENT:

The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

BASIS FOR RELIEF:

There are no connection points or pressure taps between these valves; thus, there is no practical method for pressure testing this section of piping between the valves and condensate storage tanks.

ALTERNATE EXAMINATION:

Accessible portions of the subject piping will be visually inspected while it is pressurized to the pressure imposed by the static head of the condensate storage tank(s) at the maximum tank level.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 24

SYSTEM: Control Rod Drive - Scram Discharge

COMPONENTS: Piping and components in the scram discharge flowpath downstream of the scram discharge manual isolation valves (V-18-1542 through V-18-1630). Refer to P&ID 118

CODE CLASS: 2

CODE TEST REQUIREMENT:

The system hydrostatic test pressure shall be at least 1.25 times the system design pressure for systems with design temperature above 200°F.

BASIS FOR RELIEF:

Design pressure for the scram discharge piping and components is 1146 psig; thus, the required test pressure is 1433 psig. The scram discharge volume is provided with float-type level switches that have a failure mode of collapsed or leaking ball floats. As a result, the General Electric Co. has issued an advisory letter recommending that the maximum hydrostatic test pressure for the switches be limited to a maximum of 1250 psig. Due to the arrangement of the DAEC scram discharge piping, it is not practical to isolate all of the switches during the hydrostatic test because each of the points available for introducing test pressure is unisolable from a switch.

Note also that a reduced test pressure is acceptable since the maximum expected pressure within the CRD scram discharge volume during a scram is only 65 psig.

ALTERNATE EXAMINATION:

The scram discharge piping and components will be subjected to a hydrostatic test at a nominal test pressure of 1225 psig, at the system low point. This pressure allows for a tolerance needed to permit proper pressure control in order to remain below 1250 psig at the pressure switches.

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
Docket No: 50-331
Op. License No: DPR-49

ASME SECTION XI REQUEST FOR RELIEF

RELIEF REQUEST NO. 25

SYSTEM: Residual Heat Removal

COMPONENTS: 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.

CODE CLASS: 2

CODE TEST REQUIREMENT:

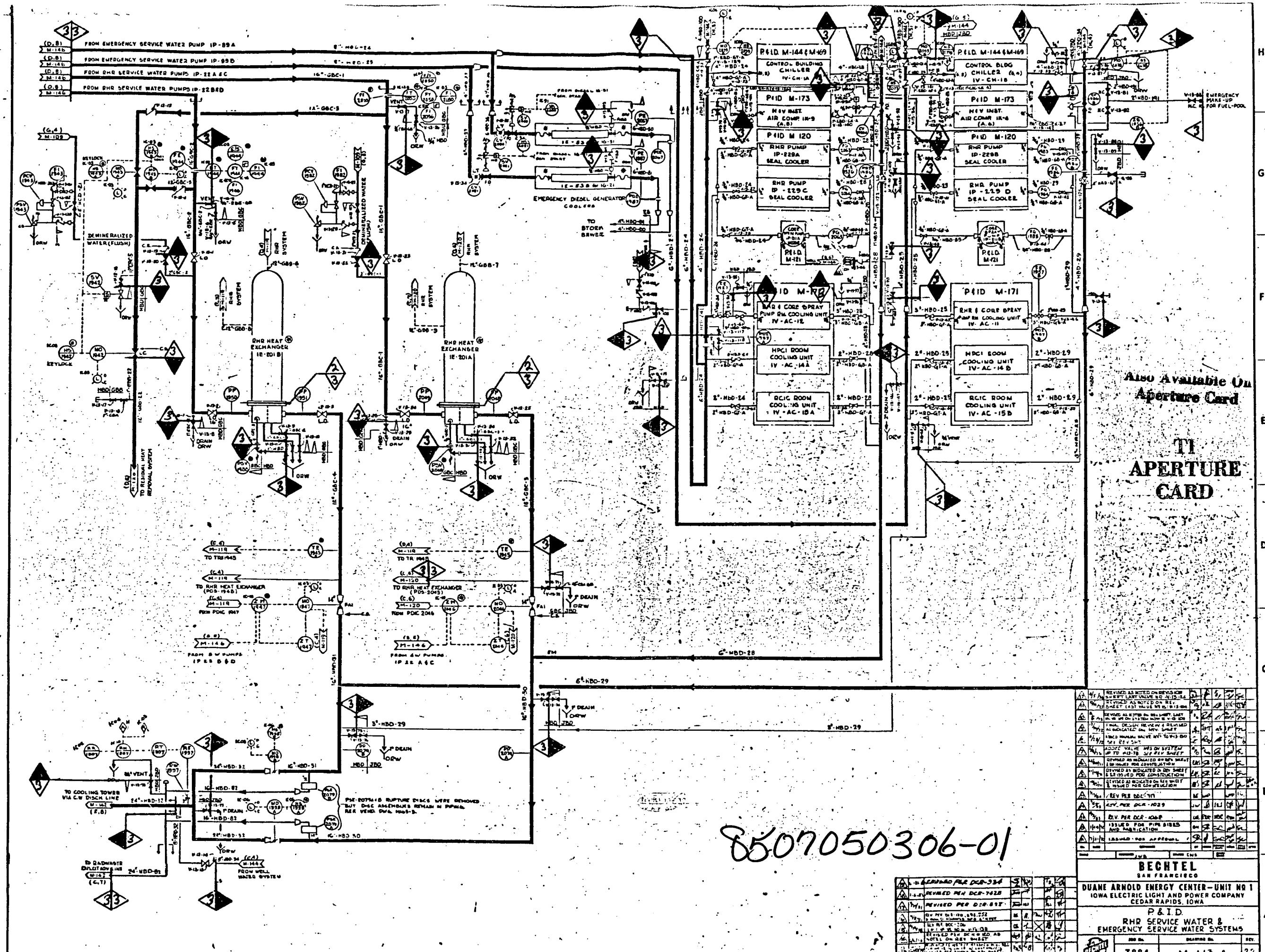
The pressure-retaining components within the boundary of each system shall be visually examined while the system is under the hydrostatic test pressure. (IWA-5210)

BASIS FOR RELIEF:

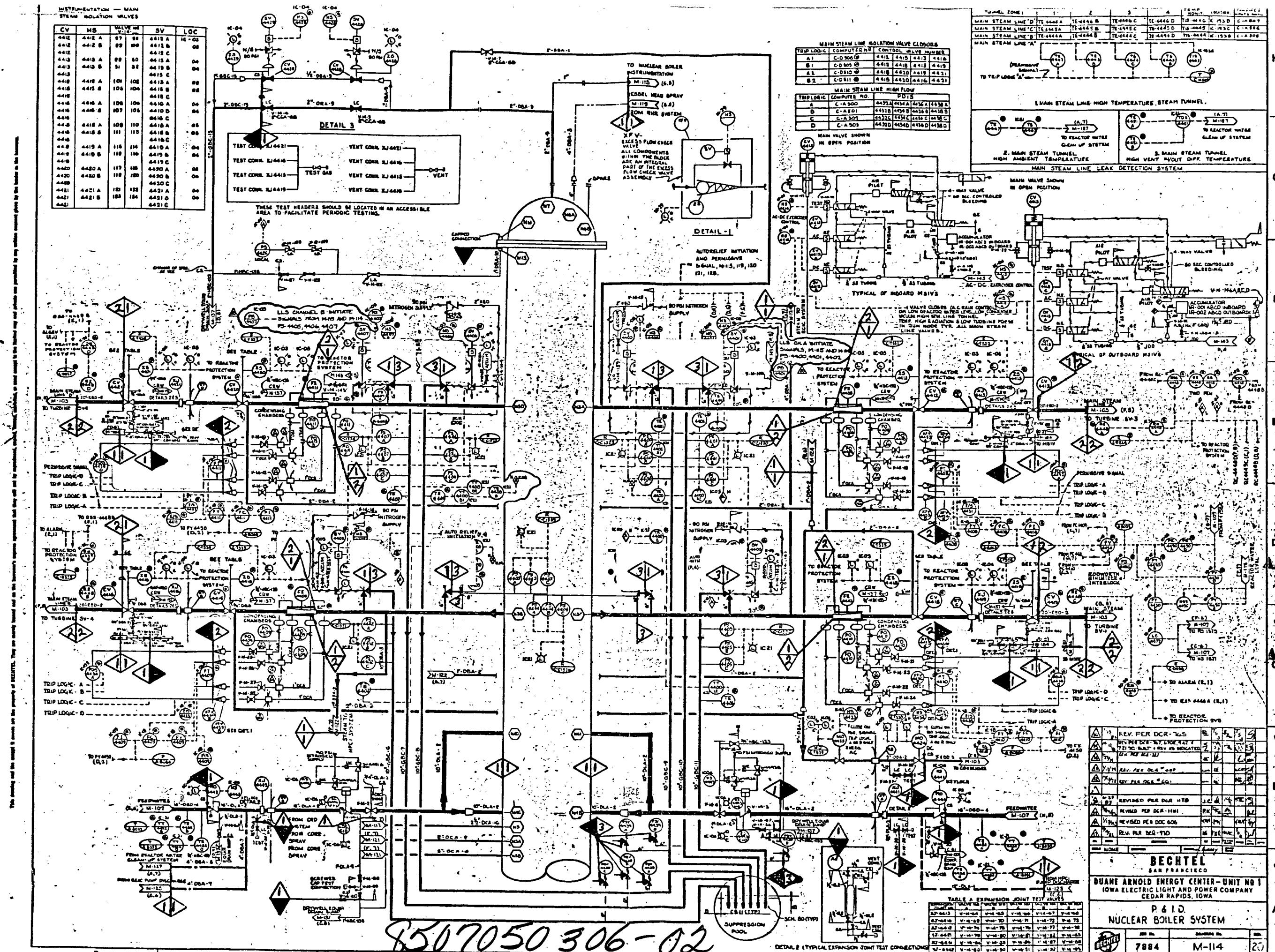
There is no practical means of inspecting the embedded portion of piping.

ALTERNATE EXAMINATION:

The outer extremities of the pipe segment will be inspected for any indication of leakage within the wall.

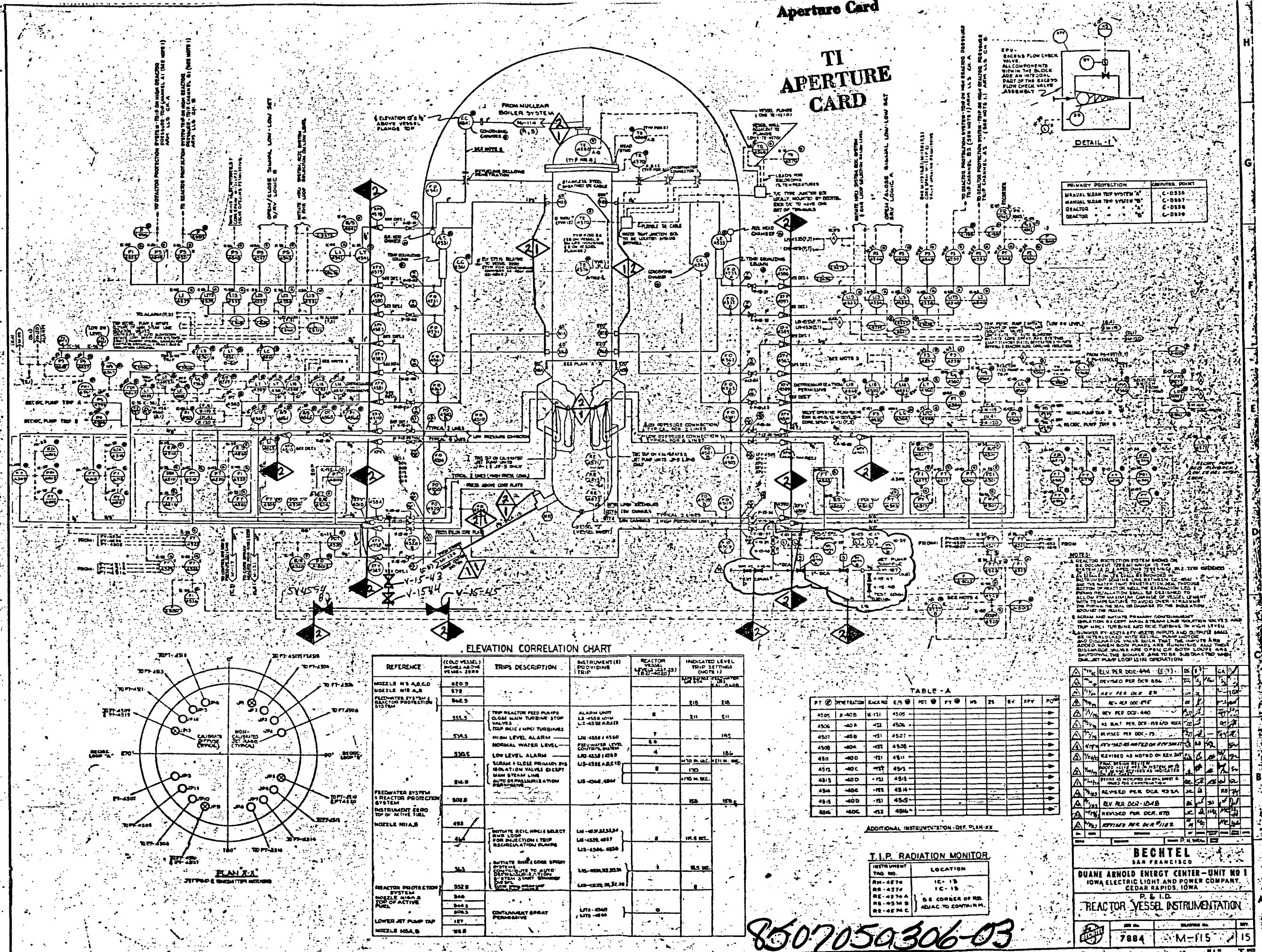


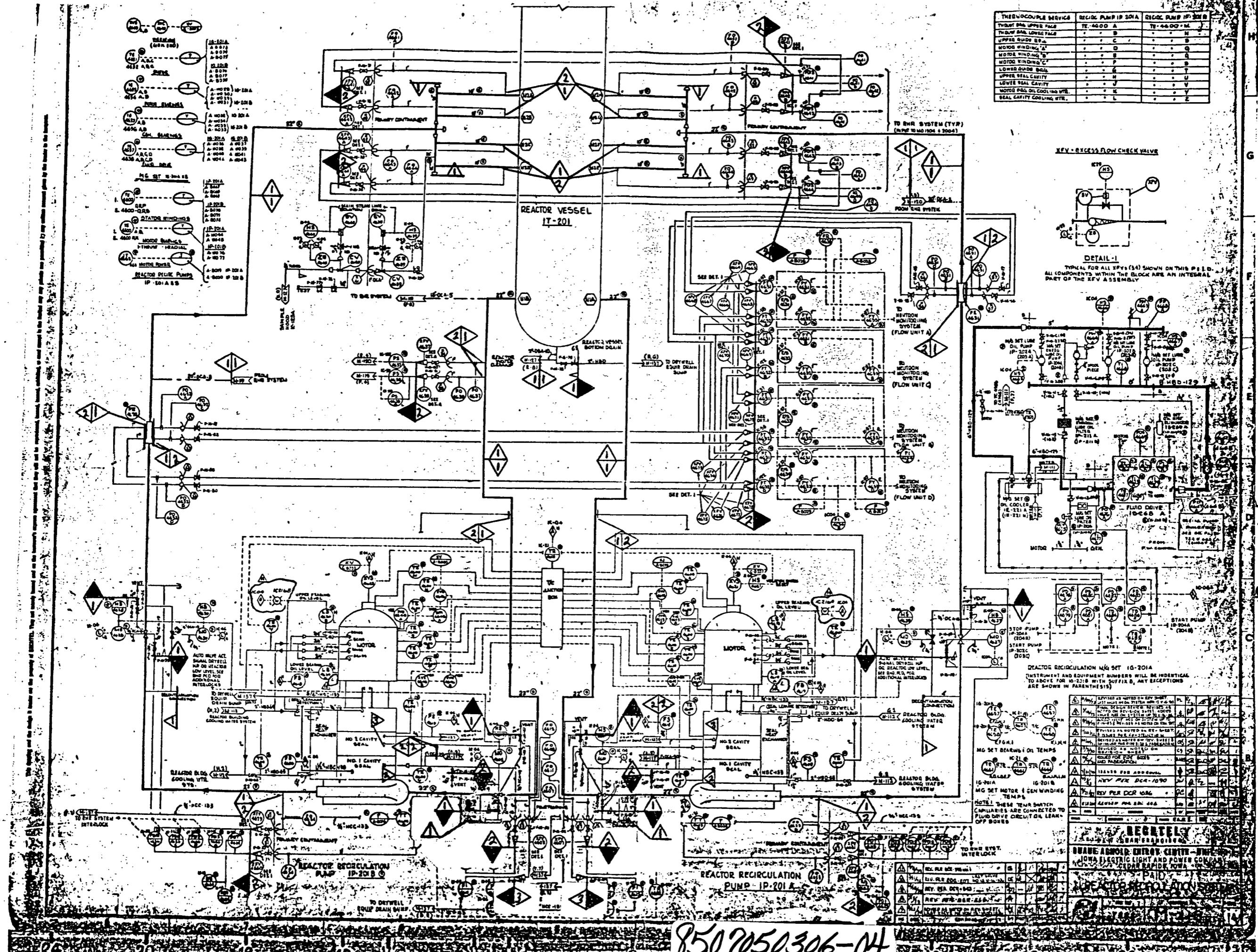
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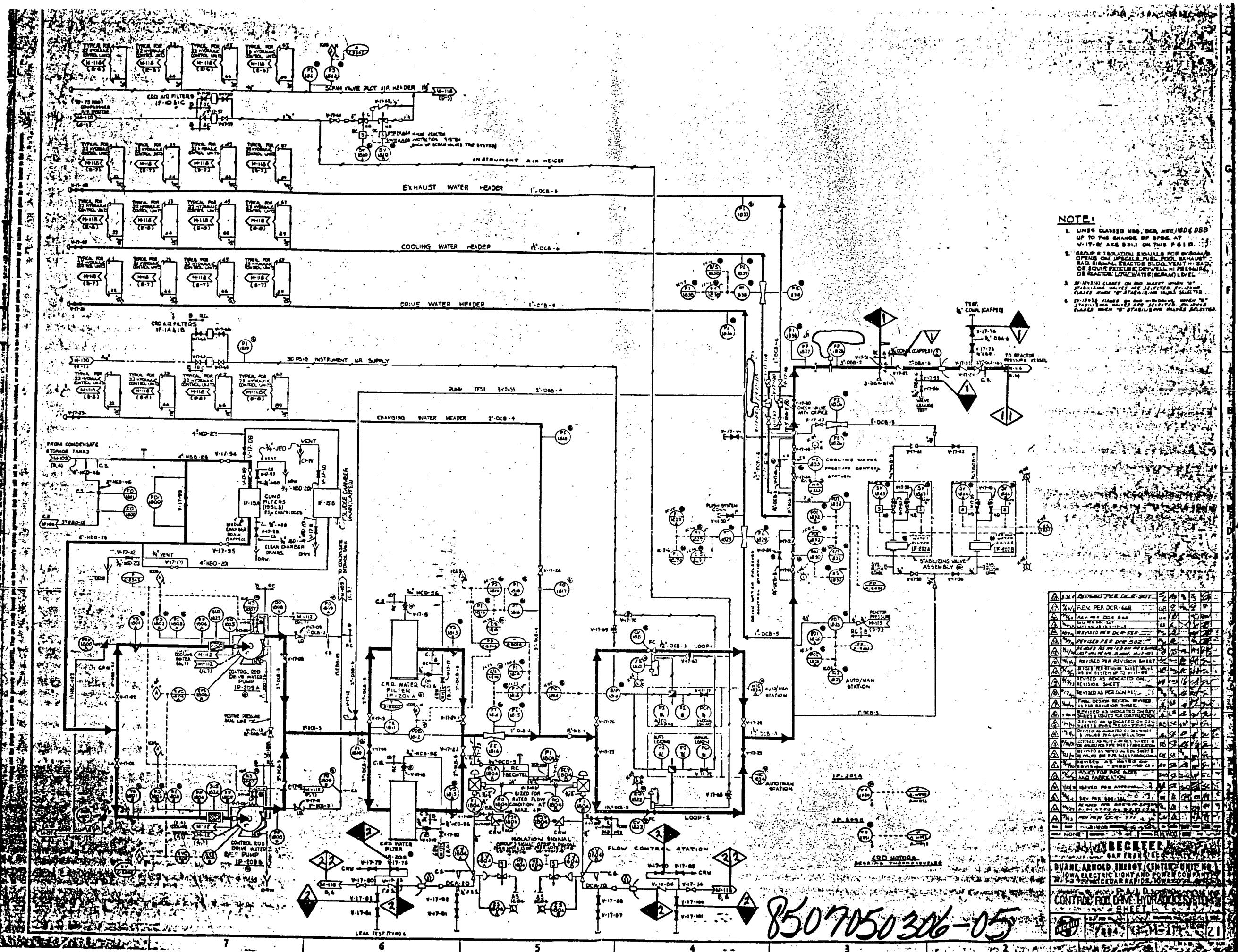




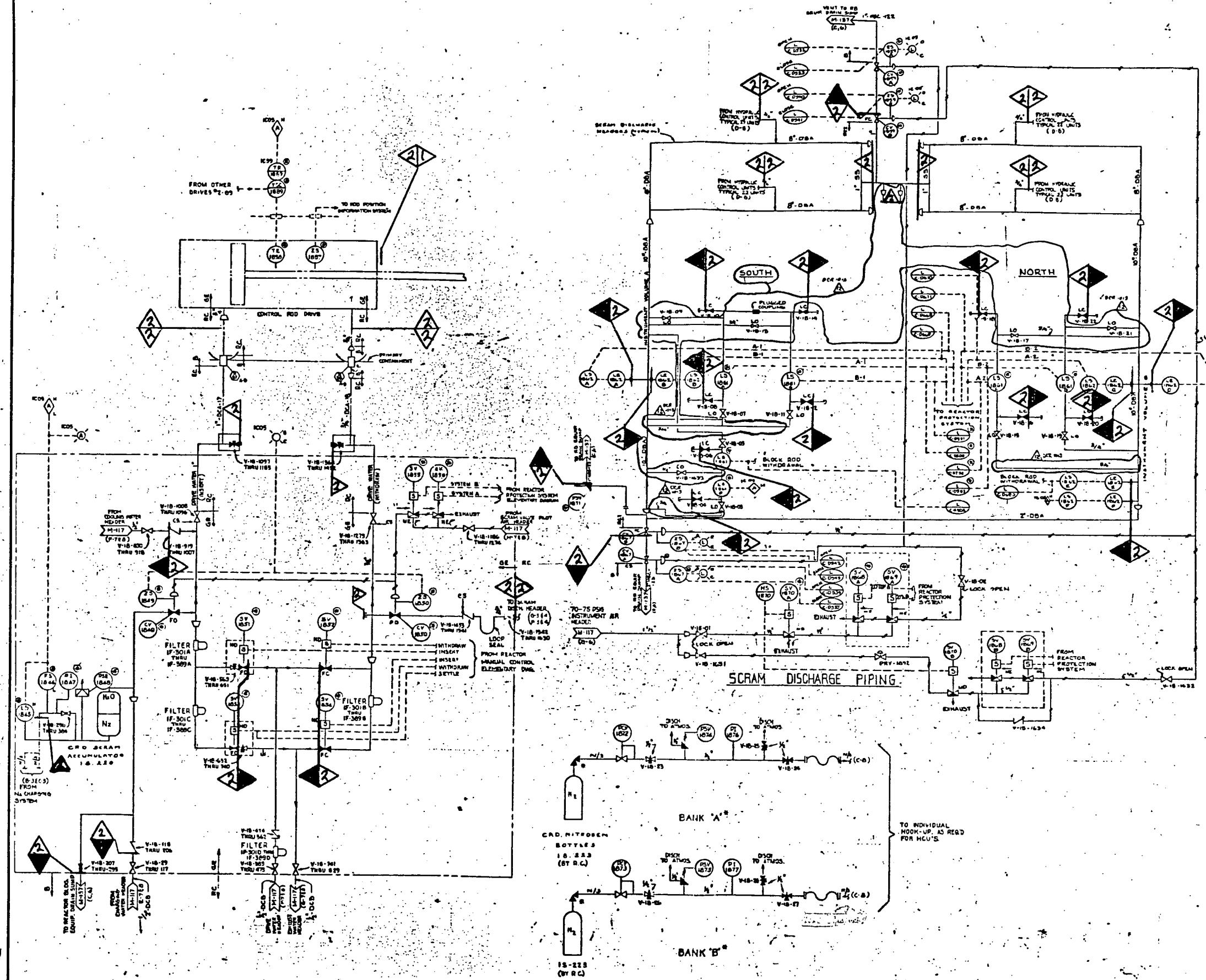
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and the author's name and address are given at the end of each article.



HYDRAULIC CONTROL UNIT
(TYPICAL FOR 89 UNITS)

17-2

ACCUMULATOR NITROGEN CHARGING SYSTEM

8507050306-0

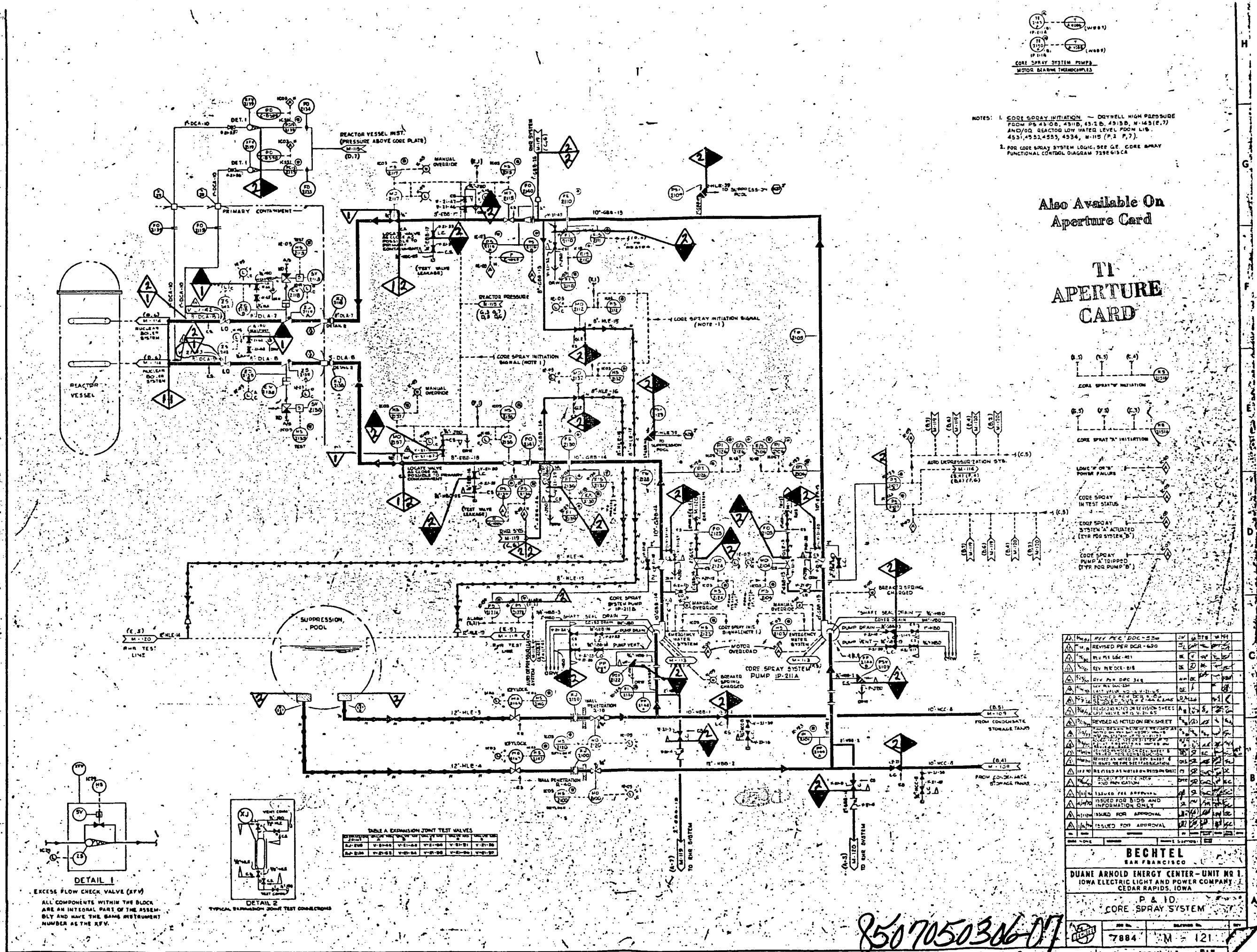
A	10-1	REV PLS DCR-101A AS BUILT SHEET CONTRACT ONLY SEE REVISIONS	11	PCP	10/1
A	10-2	REV FOR DCR-362	12	PCP	10/1
A	X-101	FINAL DESIGN REVIEW, REVISED FOR CONTRACT SHEET	13	PCP	10/1
A	X-102	DESIGN FOR CONSTRUCTION SHEET UP TO 10-10-101A DCR-362	14	PCP	10/1
A	X-103	REVISED AS INDICATED IN DCR-362 2 ISSUED FOR CONSTRUCTION	15	PCP	10/1
A	X-104	LEVELS AS INDICATED IN DCR-362 1 ISSUED FOR CONSTRUCTION	16	PCP	10/1
A	X-105	SHEDS AS NOTED ON 10-101A ISSUED FOR CONSTRUCTION	17	PCP	10/1
A	X-106	STORM DRAINS AS NOTED ON 10-101A ISSUED FOR CONSTRUCTION	18	PCP	10/1
A	X-107	ANV-362 AS NOTED ON CONSTRUCTION SHEET	19	PCP	10/1
A	X-108	POLE HOLE FOR PIPE SHEETS ISSUED FOR CONSTRUCTION	20	PCP	10/1
A	X-109	ISSUED FOR APPROVAL	21	PCP	10/1
A	X-110	REMOVED FOR DCR-362 (10-101A) (10-102) (10-103) (10-104)	22	PCP	10/1
A	X-111	REMOVED FOR DCR-362 (10-101A) (10-102) (10-103) (10-104)	23	PCP	10/1
A	X-112	REV FOR DCR-362 (10-101A) (10-102) (10-103) (10-104)	24	PCP	10/1
A	X-113	REV FOR DCR-362 (10-101A) (10-102) (10-103) (10-104)	25	PCP	10/1

BECHTEL
SAN FRANCISCO

DUANE ARNOLD ENERGY CENTER - UNIT NO 1
IOWA ELECTRIC LIGHT AND POWER COMPANY
CEDAR RAPIDS, IOWA

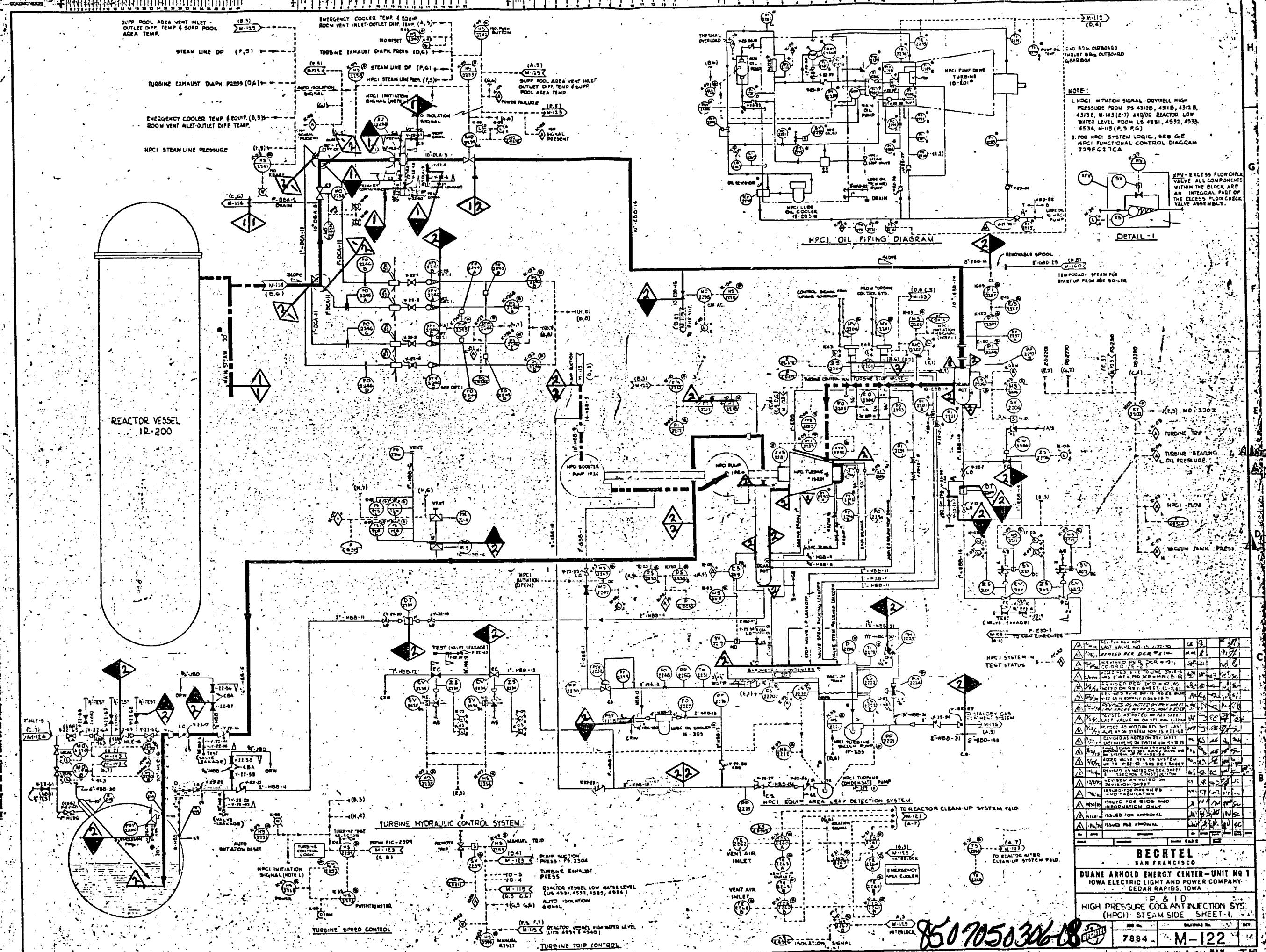
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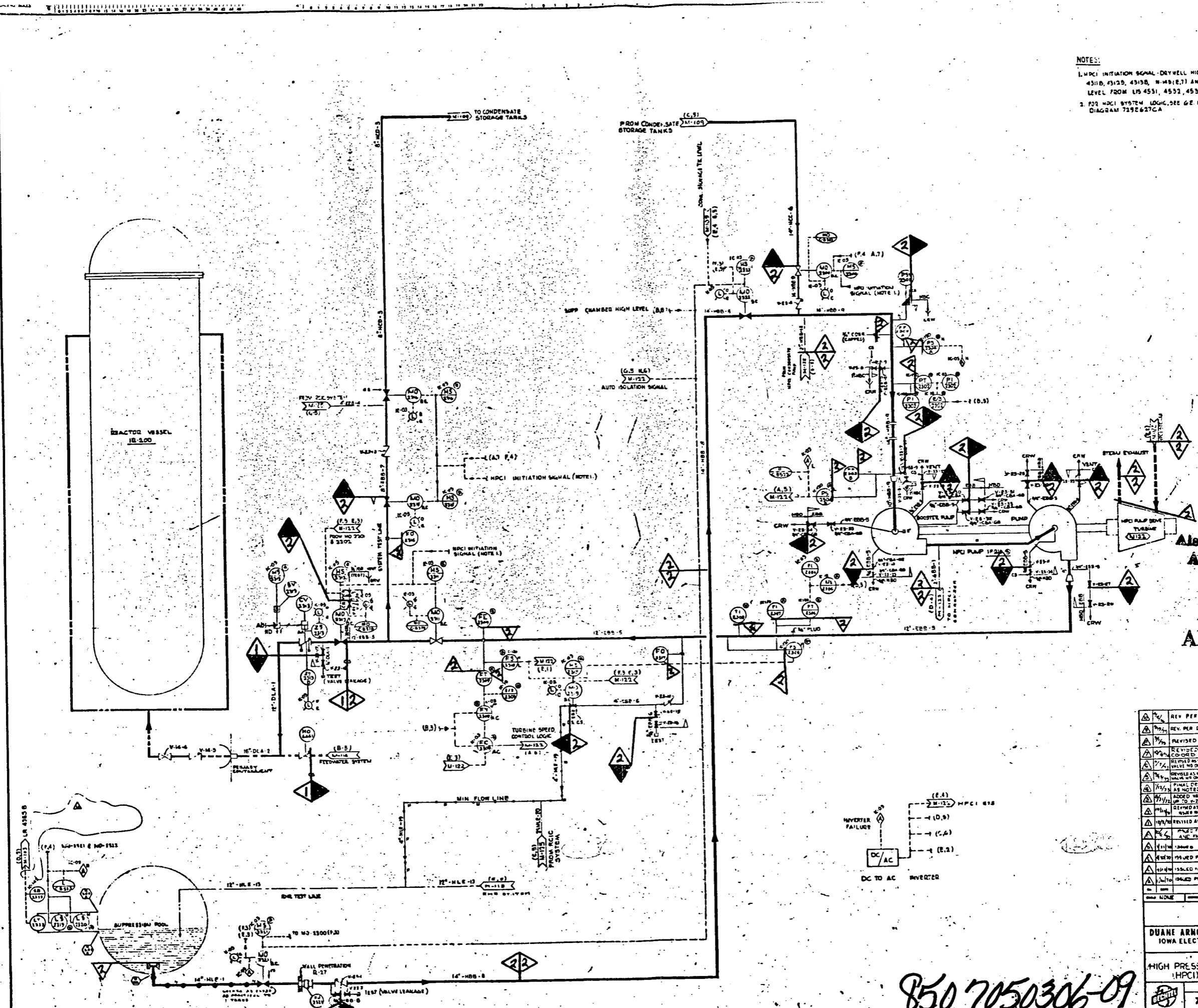
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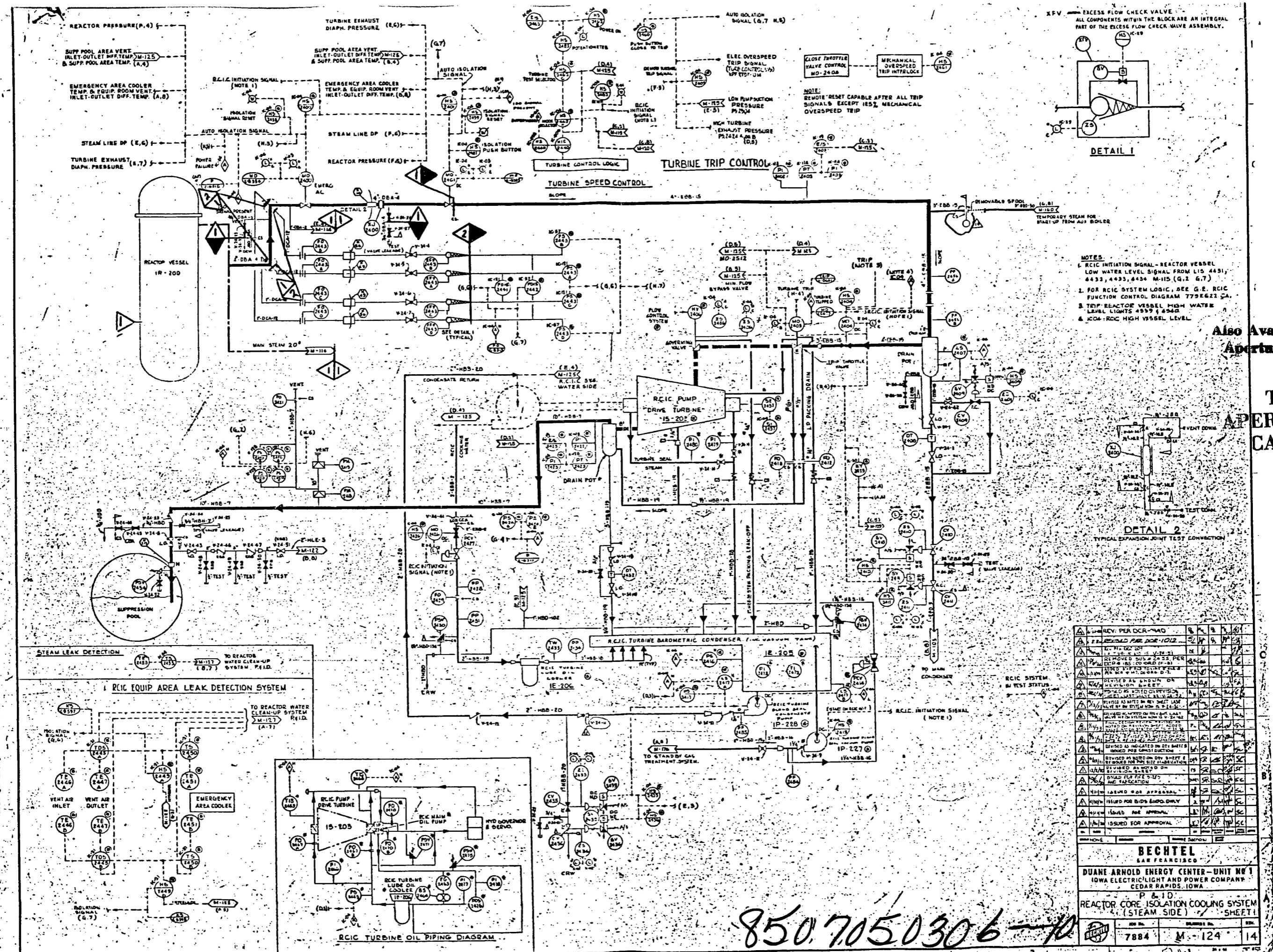
**OLD ENERGY CENTER—UNIT NO 1
TRIC LIGHT AND POWER COMPANY
CEDAR RAPIDS, IOWA**

P. & I D
SURE COOLANT INJECTION SYS.
WATER SIDE SHEET 2

ITEM NO.	DESCRIPTION	QTY.
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7884 M-23 10

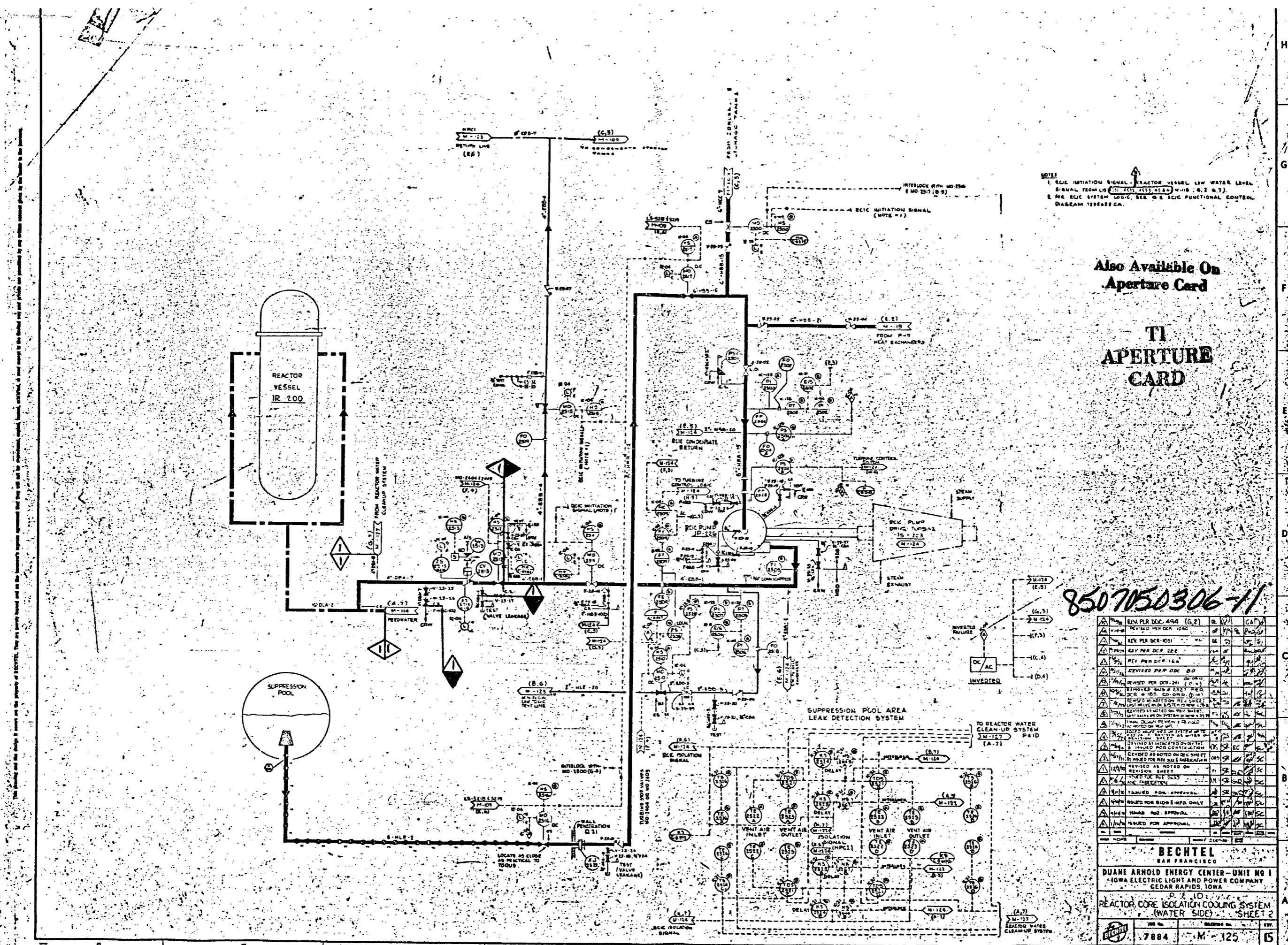
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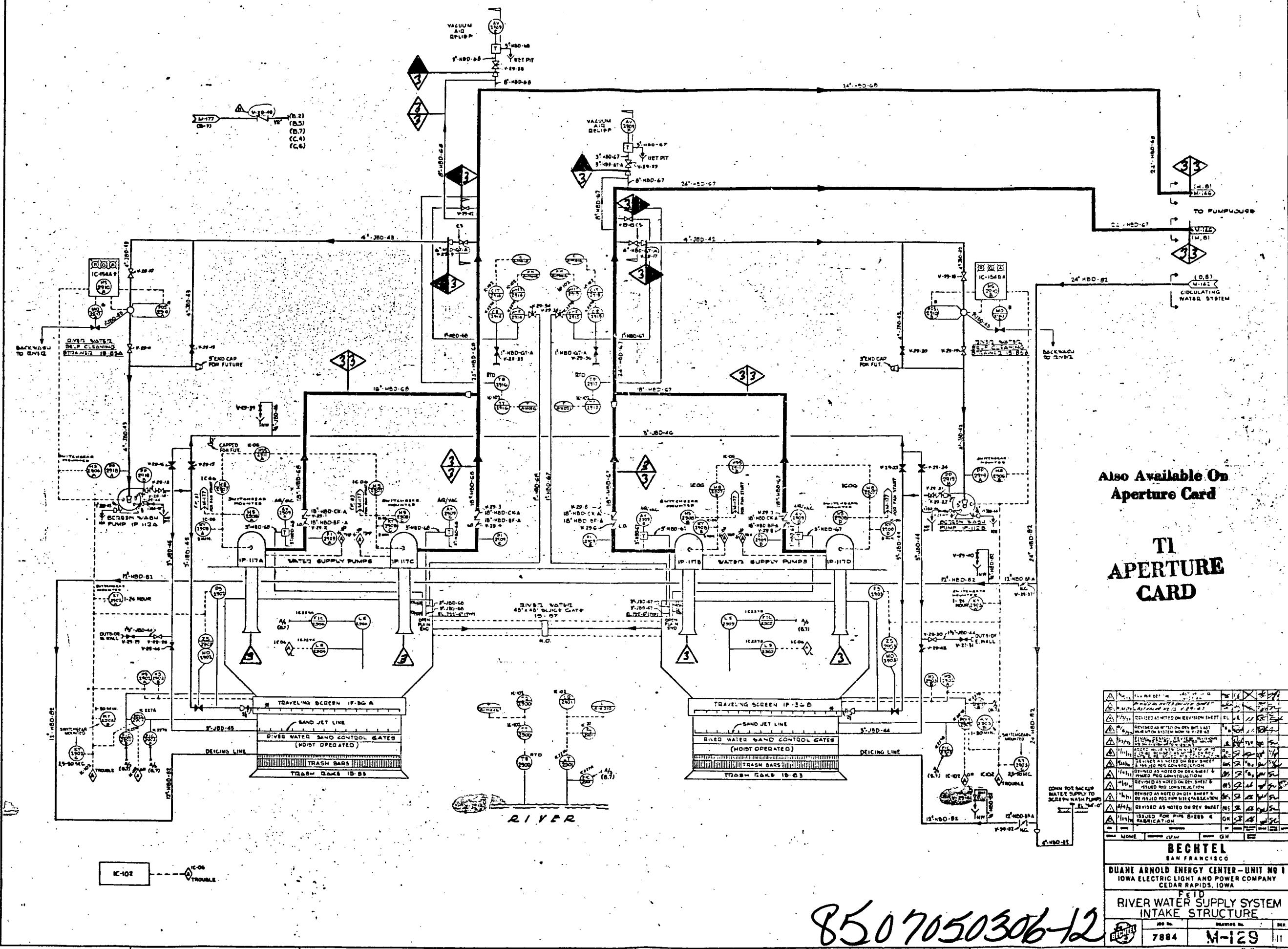


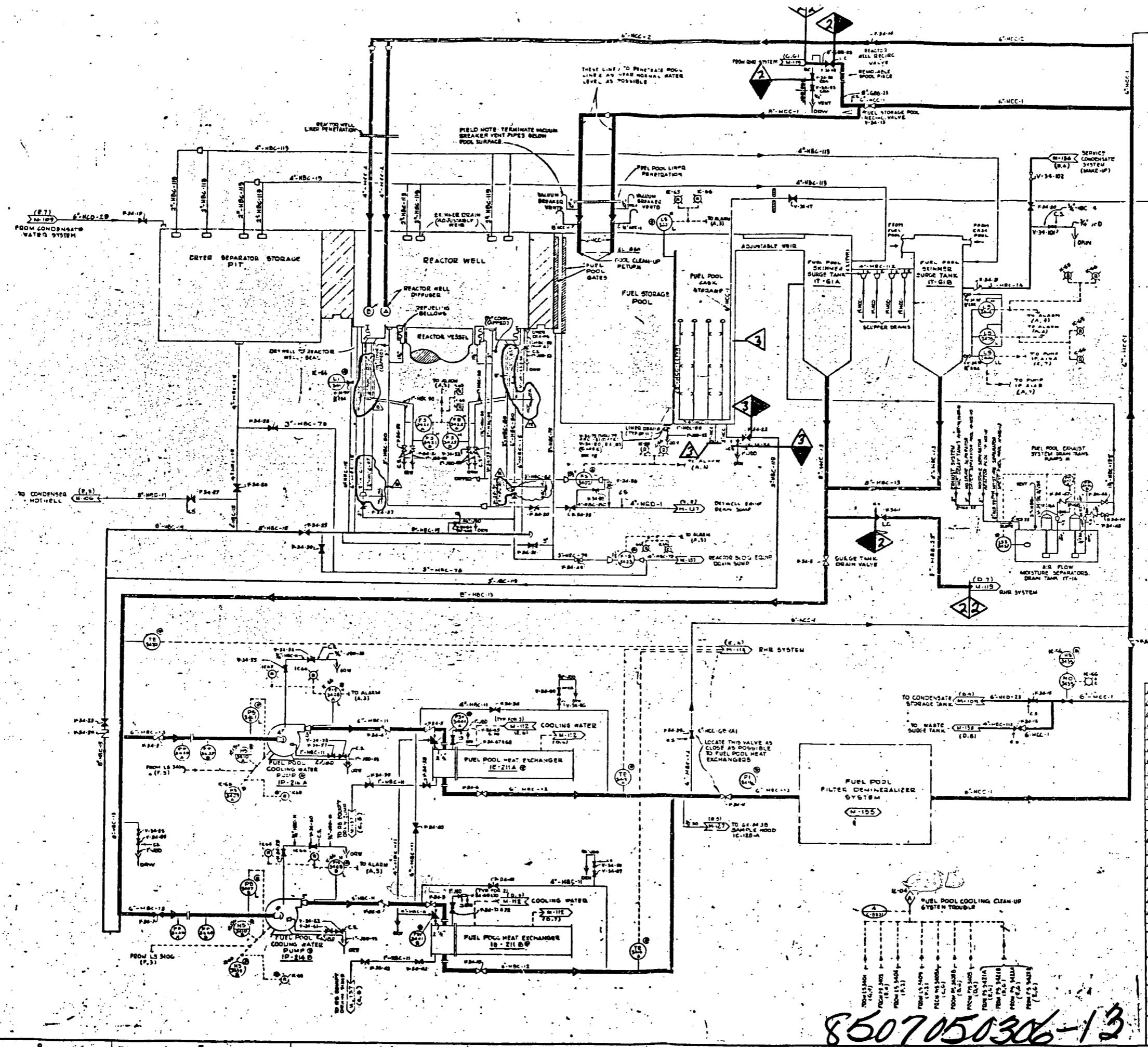
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CEDAR RAPIDS, IOWA**

P&ID
POOL COOLING & CLEAN-UP
SYSTEM

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