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CONTROL NO: XXXXXXX

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C. W. Sandford		6-1-72	6-9-	<u>72</u>	<u> </u>				
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Regulatory



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IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office CEDAR RAPIDS, IOWA June 1, 1972 IE-72-290

C. W. SANDFORD VICE PRESIDENT

> U. S. Atomic Energy Commission Directorate of Licensing Washington, D.C. 20545 Attention: Edward J. Bloch, Actg. Dir.

> > October 12, 1971



Gentlemen:

Your referenced letter stated that in accordance with the Commission's regulation in 10CFR50.109 you were reviewing the possible need for backfitting of plants, such as the Duane Arnold Energy Center, that received a construction permit prior to the date Safety Guide #7 was issued to provide hydrogen control systems other than purging and requested additional information to complete your review.

Since Safety Guide #7 was published in March 1971, various solutions have been considered which hopefully would resolve the problem of hydrogen control. The Duane Arnold Energy Center FSAR Appendix G, Section G.7 describes a solution to controlling the combustible gases within the containment by simply diluting the combustible gases. Thus the combustible gases will always remain below their flammability limit. It has been determined in accordance with the guidance provided in Safety Guide #7 that this proposed containment atmosphere dilution operation is an acceptable method of controlling the combustible gas concentration within the containment following a loss-of-coolant accident.



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> Using the assumptions contained in Table 1 of Safety Guide #7, our evaluation indicates that venting would not be required to keep hydrogen and oxygen concentrations below the limits listed in Safety Guide #7.

The containment atmosphere dilution operation does not result in any increased exposure to the public over that calculated and presented in FSAR Section 14.9. However, evaluation of the incremental radiological effects of containment venting has been performed assuming that the primary containment is completely exhausted of all remaining activity during a seven-day period arbitrarily assumed to start 30 days after LOCA. Based upon this evaluation, the resulting incremental exposures would be low compared to those exposures reported in the DAEC FSAR due to containment leakage following LOCA. This information is contained in Table G.7-2 of the FSAR.

In summary, Iowa Electric, in our judgement, is providing in its design of the Duane Arnold Energy Center an acceptable hydrogen control system in accordance with the guidance of Safety Guide #7.

We would be pleased to discuss this matter further at your convenience.

Very truly yours,

E.W. Sandford C. W. Sandford

Vice President

DMF:CWS:hp

cc D. Arnold

R. Lowenstein