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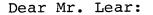
## IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office Cedar Rapids. Iowa

November 9, 1977 IE-77-2070

LEE LIU VICE PRESIDENT - ENGINEERING

> Mr. George Lear, Chief Operating Reactors Branch 3 Division of Operating Reactors Nuclear Regulatory Commission Washington, D.C. 20555



My letter of September 9, 1977 stated that we would propose Technical Specifications for safety relief valve surveillance by November 9, 1977.

As stated in our letter of September 9, we are concerned that the increased test requirements could seriously degrade the reliability of the Duane Arnold Energy Center. We do not have any further information to alleviate that concern. After further consideration on our part, and further discussion with our supplier, we continue to believe that the additional tests you requested are not a desirable part of our program to upgrade safety relief valve reliability.

We have been working with General Electric to achieve added reliability of safety relief valves and believe that their program of (1) increased simmer margin, (2) improved pilot leakage detection, (3) pilot filter installation and (4) improved valveoperator diaphragm to be a productive approach. Pilot valve leakage is monitored which gives indication of the necessity to repair valves. Pilot filters and improved air operator diaphragms have been installed. We believe the surveillance program specified in our Technical Specifications coupled with the above program to be sufficient.

We would be pleased to discuss this item with you further, if you desire.

Very truly yours,

Lee Liu \ Vice President-Engineering

LL:D cc:K. Meyer D. Arnold R. Lowenstein R. Clark (NRC) L. Root File T-23j

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