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TO:

Mr. George Lear

FROM:

Iowa Electric Light & Pwr. Co.  
Cedar Rapids, Iowa  
Lee Liu

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12/13/77

DATE RECEIVED

12/19/77

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DESCRIPTION

Consists of info. concerning applicant's  
evaluation of Appendix J.....

(2-P)

PLANT NAME: Duane Arnold

RJL 12/19/77

ENCLOSURE

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SAFETY

FOR ACTION/INFORMATION

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LEAR

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## IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

December 13, 1977

IE-77-2241

LEE LIU

VICE PRESIDENT - ENGINEERING

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



Dear Mr. Lear:

On June 3, 1977 I wrote to you concerning responses to your letter of December 29, 1976 regarding Appendix J to 10CFR50. In that letter I stated that we expected to be able to respond concerning proposed solutions, proposed exemptions and proposed Technical Specifications by December 1, 1977.

We have determined that additional test connections and valves are required to allow testing in accordance with the provisions of Appendix J. Additional test connections and valve design changes are being engineered. We expect that these modifications will be completed during the 1979 refueling outage if material availability is not a constraint. In order to minimize material availability constraints, we have scheduled completion of the engineering phase for May 1, 1978.

Due to physical constraints in the original design of the Duane Arnold Energy Center (DAEC) it does not appear possible to add valves and test connections to the HPCI and RCIC steam lines. At the present time it appears that alternate testing methods are capable of obviating the need for exemptions; however, our evaluation is not complete. Engineering of the modifications described in the above paragraph may show the need for exemptions in addition to the HPCI and RCIC steam lines or may indicate methods to delete exemption requests.

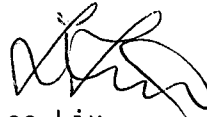
In order to make our evaluations, we had contracted with G.E. for dose rate calculations and had contracted with Bechtel to evaluate our compliance with Appendix J and propose conceptual modifications. We had expected that the results of the G.E. and Bechtel evaluations would allow us to proceed with design changes. We have determined that testing of paths in parallel to the feedwater check valves, based on the results of the G.E. and Bechtel studies, is necessary to properly engineer modifications. This testing will be conducted during the 1978 refueling outage.

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Mr. George Lear  
IE-77-2241  
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We acknowledge that progress in our evaluation of Appendix J to date has been slower than anticipated, but believe we are proceeding in a responsible manner. Positive actions are being taken to resolve this issue by May 1, 1978 with the exceptions of the feedwater check valves and parallel lines. We plan to propose Technical Specifications and update our feedwater check valve modification plans by July 1, 1978. A completion date prior to July 1 for the feedwater check valves is not possible as data from testing will not be available until about May 1, 1978. If further information is required, please call us.

Very truly yours,



Lee Liu  
Vice President, Engineering

LL/KAM/gan  
cc: K. Meyer  
D. Arnold  
R. Lowenstein  
R. Clark (NRC)  
L. Root  
T-23i  
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