Docket No. 50-331

Iowa Electric Light & Power Company ATTN: Mr. Duane Arnold President Security Building P. O. Box 351 Cedar Rapids, Iowa 52406

Gentlemen:

RE: DUANE ARNOLD ENERGY CENTER

We have noted a potential deficiency in the method being used to confirm valve operability during periodic testing of Boiling Water Reactor (BWR) safety-relief valves. This deficiency concerns the use of the safety-relief valve temperature indication as the principal, positive method of confirmation that a safety-relief valve is open when manually actuated during surveillance testing.

We have found that an increased temperature indication may be obtained at the safety-relief valve exit with the safety-relief valve closed. This indicated temperature increase is the result of steam vented through the valve actuation mechanism during the surveillance test. In view of this finding, we have concluded that a temperature increase at the valve exit, by itself does not provide a positive means of verification that the safety-relief valve has opened.

We have reviewed your Technical Specifications and have discussed this issue with members of your staff. We have determined that your Technical Specifications do not adequately describe the test method that assures safety valve operability. Therefore, you should propose a change to your technical specifications that provides a positive means of verification that the safety-relief valve opens when tested.

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Please submit your proposed Technical Specification changes within 60 days of your receipt of this letter. Your submittal should include the basis for your proposal and in particular should address the adequacy of the method proposed to positively assess the opening of safety-relief valves.

Sincerely,

George Lear, Chief Operating Reactors Branch #3 Division of Operating Reactors

cc: Jack R. Newman, Esquire
Harold F. Reis, Esquire
Lowenstein, Newman, Reis and Axelrad
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

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