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 MCCAUGHY, R.W. Iowa Electric Light & Power Co.
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 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards fourth semiannual "Rept on Environ Qualification Program for Duane Arnold Energy Ctr" re covering safety-related electrical equipment.

SEE REPTS.

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10/12/83

Iowa Electric Light and Power Company
September 30, 1983
NG-83-3368

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
Qualification of Safety-Related Electrical
Equipment

Dear Mr. Denton:

This letter and attachment comprise Iowa Electric Light and Power Company's fourth semiannual report on the environmental qualification (EQ) program for the Duane Arnold Energy Center (DAEC).

The scope of this report has been chosen to simplify and improve the efficiency of future reviews. To achieve this goal, the attached report incorporates or supersedes relevant information appearing in Iowa Electric's four previous EQ submittals dated January 29, 1982; July 15, 1982; February 11, 1983; and May 20, 1983. Where information previously submitted has been found acceptable by Franklin Research Center in its Technical Evaluation Report (TER) C5257-499 dated August 18, 1982, a note to this effect has been added to the section of the attached report containing the information.

Section II of the report provides an update of actions to resolve environmental qualification action items. Twenty-three of the 41 action items have been completely resolved by analysis, equipment replacement, or equipment relocation. Seventeen action items will be resolved by replacement or installation of new equipment between now and the end of the DAEC Cycle 8 refueling outage and resolution of action item 31 will be addressed as part of the NUREG-0737 Supplement 1 review.

Section III reiterates previous positions relative to the HPCI system, RHR corner room high energy line breaks, and method of evaluating harsh environment equipment aging effects. Section III also includes three new subsections describing methods of complying with 10 CFR 50.49 for replacement parts/equipment, additions to the list of equipment requiring EQ and the system sort of equipment requiring EQ.

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Mr. Harold Denton
September 30, 1983
NG-83-3368
Page Two

Section IV describes the status of actions to identify accident monitoring instruments requiring EQ. Any changes to this list will be addressed in future responses to Supplement 1 of NUREG-0737.

Section V provides a description of the report's Appendix B3 data and evaluation sheets [system component evaluation worksheets (SCEW)].

Sections VI through VIII are an update of technical summary responses previously submitted for TER comments on DAEC equipment classified as Category I.b, II.a, and IV, respectively. Responses to TER comments on Category II.c equipment items have not been requested by the NRC; but because those comments are the only group not yet addressed, the information contained in Section IX is volunteered in the interest of completeness and to demonstrate continued responsiveness on the EQ issue.

Appendix A is an update of the list (sorted by system) of DAEC electrical equipment requiring EQ. Mild environment equipment have been excluded from this appendix consistent with the scope of 10 CFR 50.49.

As discussed in our letter of February 11, 1983, Iowa Electric maintains an aggressive EQ program which we believe to be responsive to NRC identified concerns.

With the submission of this fourth semi-annual EQ report (which is intended to provide a final EQ resolution and update status), we request that the NRC complete its review of the DAEC EQ program and issue a final SER closing out the issue.

If we can be of further assistance, please advise.

Very truly yours,



Richard W. McGaughey
Manager, Nuclear Division

RWM/BWR/dmh*

Attachment: Fourth Semiannual Report on Environmental Qualification Program

cc: B. Reid
L. Liu
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NRC Resident Office
Commitment Control No. 83-0232