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 MURLEY,T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Responds to NRC request for plant specific seismic verification plans consistent w/Generic Ltr 87-02.

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Iowa Electric Light and Power Company

September 30, 1988

NG-88-3209

Dr. Thomas E. Murley  
Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Duane Arnold Energy Center

Docket No.: 50-331

Op. License No.: DPR-49

Integrated Plan Schedule B Change: Verification of  
Seismic Adequacy of Mechanical and Electrical Equipment

- Reference: (1) Letter, L. Shao to N. Smith, Generic Safety Evaluation  
on SQUG Generic Implementation Procedure for  
Implementation of USI A-46 "Seismic Qualification of  
Equipment in Operating Plants," July 29, 1988.  
(2) Letter, W. Rothert to T. Murley, "Semiannual Report for  
the Plan for the Integrated Scheduling of Plant  
Modifications for the DAEC," NG-88-1360, May 3, 1988.  
(3) NRC Generic Letter 87-02, "Verification of Seismic  
Adequacy of Mechanical and Electrical Equipment in  
Operating Reactors, Unresolved Safety Issue (USI)  
A-46," February 19, 1987.

File: A-278, A-107a, A-86, A-101b

Dear Dr. Murley:

This letter provides Iowa Electric's schedule for implementing a seismic verification program at the Duane Arnold Energy Center (DAEC) as specified by Reference 1. In addition, this letter provides notification of a change in Schedule B, as required in Section V.B of the "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (Integrated Plan). We have discussed this change with your staff.

In our most recent semiannual report for the Integrated Plan (Reference 2), we added to Schedule B a new item titled "Verification of Seismic Adequacy of Mechanical and Electrical Equipment." We indicated that the schedule for the completion of this item was not yet certain because we were awaiting the promulgation of NRC requirements.

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG transmitting the SER (Reference 1) requests that SQUG member utilities provide to the NRC, within 60 days after receipt of the letter, a schedule for implementing the GIP. This letter responds to the NRC request for our plant-specific seismic verification plans for the Duane Arnold Energy Center (DAEC) consistent with the requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and

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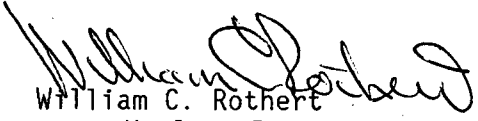
Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46" (Reference 3).

As members of SQUG and the Electric Power Research Institute (EPRI), we have supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to the satisfactory resolution of a number of open issues and NRC comments. SQUG and its contractors are working to resolve the identified open issues and comments in accordance with the schedule presented by SQUG at their meeting with the NRC Staff on August 10 and 11, 1988 and formally transmitted in the SQUG letter to Mr. Lawrence C. Shao dated August 19, 1988. This schedule projects completion of Revision 2 of the GIP in Spring 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is required to implement Generic Letter 87-02 at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989.

Iowa Electric's plans for implementing the GIP at the DAEC are preliminary because of the outstanding items described above. However, we currently plan to resolve USI A-46 for DAEC by implementating the generic criteria and methodology included in Revision 2 of the GIP. We may find it necessary to take exception to specific portions of the GIP which are found to be inappropriate or not applicable to the DAEC. Based on the currently envisioned work scope and schedule for the issuance of the SER on Revision 2 of the GIP, the plant walkdown at DAEC will be completed before the start of Cycle 12 (December 1991), and the final report will be issued within 60 days thereafter (February 1992). Identification of safe shutdown equipment, gathering of necessary plant-specific data and training of our walkdown team members will be initiated prior to the Cycle 11/12 refueling outage. Any changes to this schedule will be reflected in the semiannual updates to our Integrated Plan.

Please contact this office if you require further information about this matter.

Very truly yours,

  
William C. Rothert  
Manager, Nuclear Division

WCR/TLF

cc: T. Forker  
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