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SUBJECT: Forwards addl info re response to Generic Ltr 83-28.

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Iowa Electric Light and Power Company

June 15, 1989
NG-89-1705

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to Request for Additional Information
Regarding Iowa Electric's Response to Generic
Letter 83-28: "Required Actions Based on Generic
Implications of Salem ATWS Events."

Reference: Letter, R. McGaughy (IELP) to H. Denton, (NRC) dated
February 29, 1984, (NG-84-0825).

File: A-107b, A-101b, A-224

Dear Dr. Murley:

Attached you will find our response to your staff's request for additional
information regarding our referenced response to Generic Letter 83-28.

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

Very truly yours,

8906230163 890615
PDR ADOCK 05000331
Q PNU



Daniel L. Mineck
Manager, Nuclear Division

DLM/RAB/ddl+

Attachment

cc: T. Browning
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRC-NRR)
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AOS
11/1

IOWA ELECTRIC'S RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING
OUR ORIGINAL RESPONSE TO GENERIC LETTER 83-28, ITEM 2.2.1

1. The response did not make clear that all safety-related components were included in the Q-200 List. Please clarify the intent of the Q-200 List for safety-related components.

Response:

The Q-200 List provides safety classification information for plant structures, systems and components (SSC). The Q-200 List is intended to contain all safety-related SSC (Reference 1).

2. The response did not clearly indicate that components designated as safety-related on the Q-200 List are so designated on other relevant plant documents and in information handling systems which control activities that may affect the safety-related components. Also, describe briefly how these other documents receive equipment classification information.

Response:

The Q-200 List is a part of our computerized Equipment Data Base (EDB). The EDB is accessed by the "information handling systems which control activities that may affect the safety-related components." Our information handling system is called Computerized History and Maintenance Planning System (CHAMPS). CHAMPS is used to determine whether a particular activity involves safety-related SSC and in general whether our 10CFR50, Appendix B Quality Assurance Program applies controls to that activity. The preparers of "other relevant plant documents," such as Purchase Orders, Maintenance Action Requests, and Design Change Packages, access CHAMPS to obtain the equipment classification information for the SSC with which they are concerned and enter the appropriate classifications on the documents being prepared.

3. Describe the relationship of CHAMPS to the Q-200 List. Identify the organizations that control the development, validation, verification and maintenance of these information systems. Identify procedures which govern those activities for these systems. Briefly describe how unauthorized changes to the data in these systems are prevented.

Response:

The Q-200 List is a part of the EDB utilized by the CHAMPS computer program. In general, the procedural controls for all data bases and software used at the DAEC for controlled information are governed by a division level procedure (Reference 3). The development, validation, verification and maintenance of the Q-200 List and its incorporation into the EDB are the responsibility of the Design Engineering Department as specified in References 1 and 2, respectively. The development, validation, verification and maintenance of the CHAMPS program are the responsibility of the Maintenance Engineering Department as described in Reference 4. Reference 3 specifies that, "Each on-line software system shall have a security system

that permits only authorized update to those fields that are based on controlled data." Both the EDB and CHAMPS have such security systems and each has a designated Administrator who controls the changes to these systems.

4. State if CHAMPS is also used to control activities such as modifications, design changes and special engineering tests. If so, describe briefly how it is used to control these other activities.

Response:

CHAMPS is the computer software that is utilized by personnel involved in various activities to access the EDB. Thus, indirectly, CHAMPS is used to control activities such as modifications, design changes and special engineering tests, as stated in our response to Question 2,

5. State if CHAMPS or the Q-200 List is used to obtain equipment classification information for use in procuring replacement parts. If so, briefly describe its use.

Response:

CHAMPS is used in the procurement process to access the equipment classification information for SSC contained within the EDB. As directed in Reference 5, the Procurement Engineering Group reviews Material Requisitions to ensure the correct safety classification and technical and quality requirements have been specified and to perform subcomponent evaluations for replacement parts below the SSC level specified in the EDB. The safety classifications for spare and replacement parts are determined by the impact the particular procured item could have on the safety function of the SSC specified in the EDB.

6. A statement in your submittal for Item 2.2.1.3 implies that there may be some activities performed on safety-related components that may not be considered safety-related. Are there such activities? If so, identify them and explain why they should not be considered to be safety-related.

Response:

Yes. Various activities (such as maintenance, testing, design, procurement) dealing with a safety-related SSC are evaluated to determine whether a particular activity affects the safety function of that SSC. If it is determined that the activity could not affect the safety function of that safety-related SSC, then that activity can be declared to be "non-safety-related" and a lower level of control can be applied than that required by our Quality Assurance program to be applied to safety-related activities. For example, if a motor-operated valve's only safety function is to be part of the pressure-retaining boundary, then activities involving the electrical components of the motor-operator should not affect the safety function and could therefore be classified as non-safety-related. This process of evaluating the activity for its impact on the safety-related function of a particular SSC allows us to better utilize our resources by

judiciously applying our Quality Assurance program at a level commensurate with the level of quality that is required to be achieved.

List of References

1. Design Engineering Department Procedure 1203.05, "DAEC Safety-Related List (Classification of Systems, Structures and Components)."
2. Nuclear Generation Division Procedure 106.13, "Equipment Data Base Control."
3. Nuclear Generation Division Procedure 106.16, "Data Base and Data Base Software Control."
4. Duane Arnold Energy Center Procedure 1406.11, "CHAMPS Software Control."
5. Design Engineering Department Procedure 1204.11, "Procurement Engineering Group Review and Approval of Material Requisitions."