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SUBJECT: Requests approval of relief NDE-008,009 & 010 & as rev to current inservice insp plan.

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Iowa Electric Light and Power Company

September 18, 1989

NG-89-1680

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

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Requests for Relief from ASME Section XI
Requirements (NDE-008, 009 and 010)
Reference: (1) Letter from M. Virgilio (NRC) to L. Liu (IELP)
dated July 7, 1987
(2) Letter from D. Mineck (IELP) to T. Murley (NRC)
dated March 24, 1989 (NG-89-0728)
File: A-100, A-286

Dear Dr. Murley:

In Reference 1, your staff informed us that they had reviewed and approved the second 10-year Inservice Inspection Plan for the Duane Arnold Energy Center and requests for relief from the ASME Code, Section XI requirements. We have subsequently identified the need for relief from other ASME Code requirements. In accordance with 10 CFR 50.55a(a)(3), the attached requests for relief (NDE-008, 009, and 010) are submitted. We ask that they be approved as a revision to our current Inservice Inspection Plan.

Please note that, in a telephone conversation on May 17, 1989, the staff requested that we submit Request for Relief, NDE-010. The basis for this Request for Relief is contained in Attachment 2 to Reference 2.

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Dr. Thomas E. Murley
September 18, 1989
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Should you have any additional questions regarding this submittal, please contact this office.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/NKP/pjv+

Attachments: (1) Request for Relief, NDE-008
(2) Bechtel Drawing, BECH-M-361
(3) Request for Relief, NDE-009
(4) Request for Relief, NDE-010

cc: N. Peterson
L. Liu(w/o Attachment 2)
L. Root (w/o Attachment 2)
R. McGaughy (w/o Attachment 2)
J. R. Hall (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
R. West (Iowa Bureau of Boiler Inspection)

I O W A E L E C T R I C L I G H T A N D P O W E R C O M P A N Y				
DUANE ARNOLD ENERGY CENTER TEN YEAR EXAMINATION SUMMARY ASME SECTION XI SYSTEMS- REQUEST FOR RELIEF		CEDAR RAPIDS, IOWA	MAJOR ITEM: RFR NUMBER NDE-008 TABLE: SECTION 4.2 PAGE 1 OF 1	
COMPONENT OR SYSTEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
<u>Main Steam</u>				
MSA-BK-35	1	1.5.2	B-K-1	B10.10
MSB-BK-40	1	1.5.2	B-K-1	B10.10
MSC-BK-38	1	1.5.2	B-K-1	B10.10
MSC-BK-34	1	1.5.2	B-K-1	B10.10
<u>Code Requirements</u> Surface examination of essentially 100% of weld length once during the Ten Year Interval.				
<u>Basis for Relief</u> A disassembly of the restraints would be required to perform the Code-required surface examination. The disassembly would include the removal of welds and re-welding (see Attachment 2). This activity would degrade the structural integrity of the restraints and require less plant personnel man-hours and radiation exposure than the alternate examination.				
<u>Alternate Examination</u> The subject Main Steam restraints will be visually (VT-3/4) examined once per period in lieu of the surface examination required once during the Ten Year Interval.				
<u>Schedule For Implementation</u> Start of Second Period				
MSA-BK-35	Cycle 10/11 & 12/13 Outages			
MSB-BK-40	Cycle 10/11 & 12/13 Outages			
MSC-BK-38	Cycle 11/12 & 13/14 Outages			
MSD-BK-34	Cycle 11/12 & 13/14 Outages			

I O W A E L E C T R I C L I G H T A N D P O W E R C O M P A N Y

DUANE ARNOLD ENERGY CENTER
TEN YEAR EXAMINATION SUMMARY
ASME SECTION XI SYSTEMS-
REQUEST FOR RELIEF

CEDAR RAPIDS, IOWA

MAJOR ITEM: RFR NUMBER NDE-009
TABLE: SECTION 4.2
PAGE 1 OF 1

COMPONENT OR SYSTEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
<u>All Class 1 Systems (in drywell)</u>				
Reactor Vessel	1	1.1	B-P	B15.10
Piping	1	1.1	B-P	B15.50
Pumps	1	1.1	B-P	B15.60
Valves	1	1.1	B-P	B15.70
Pressure Retaining Components	1	1.1	B-P	-----

Code Requirements

1. Leakage test (IWB-5221, IWB-5210) with visual (VT-2) examination, at nominal operating pressure for Class 1 reactor vessel, piping, pumps, valves and pressure retaining components after and reclosing of pressure boundary.
2. "The system test conditions shall be maintained essentially constant during the course of the visual examination" (IWA-5212(c)).

Basis for Relief

The inspection (VT-2) of the reactor vessel and Class 1 components in the drywell containment areas during a leakage test at nominal operating pressure is hazardous for inspecting personnel due to radiation exposure and proximity to pressurized systems.

Iowa Electric Safety Manual prohibits drywell entry, except for emergencies, above 400 psig.

Alternate Examination

Visual (VT-2) examination, under reduced system pressure, of the reactor vessel, piping, pumps, valves, and pressure retaining components in the drywell during NON-REFUELING OUTAGES when disassembly and reassembly of a limited number of mechanical joints is involved.

After achieving the nominal operating pressure during plant startup, at least a 4 hour hold time will be maintained before the pressure will be reduced to the Iowa Electric personnel safety limit of 400 psig. During the 4 hour hold time the leakage collection system (i.e., drywell equipment and floor drain sumps) will be verified to be operative. A visual (VT-2) examination will then be conducted. The test condition of the system will have significant pressure (approximately 225 psig to 400 psig) during the course of the visual examination so as to assure leakage from the pressure boundary will be detected by the inspector.

Schedule For Implementation

Cycle 9/10 Refueling Outage

I O W A E L E C T R I C L I G H T A N D P O W E R C O M P A N Y				
DUANE ARNOLD ENERGY CENTER TEN YEAR EXAMINATION SUMMARY ASME SECTION XI SYSTEMS- REQUEST FOR RELIEF		CEDAR RAPIDS, IOWA		MAJOR ITEM: RFR NUMBER NDE-010 TABLE: SECTION 4.2 PAGE 1 OF 1
COMPONENT OR SYSTEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
<u>Recirculation Drain Line</u> 2-inch Diameter "B" Recirculation Pump Suction Drain Line, DCA-019	1	---	---	---
<u>Code Requirements</u> After weld repairs on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000 (1107 psig).				
<u>Basis for Relief</u> Based on plant Technical Specification limitations, a pressure test at hydrostatic test pressure was impractical during plant conditions at the time of the repair. The basis for relief was discussed per telecon between Randy Hall, Project Manager (NRC) and Tony Browning, Group Leader, Nuclear Licensing (IELP) on May 17, 1989. Refer to Attachment 2 of letter from D. Mineck (IELP) to T. Murley (NRC) dated March 24, 1989 (NG-89-0728) for details of the pressure testing performed and basis for relief.				
<u>Alternate Examination</u> Conduct pressure test to 1010 psig in lieu of a hydrostatic test.				
<u>Schedule For Implementation</u> Cycle 9/10 Refueling Outage				