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MINECK,D.L. Iowa Electric Light & Power Co.  
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MURLEY,T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Responds to Generic Ltr 89-10 re safety-related motor-operated valve testing & surveillance per 891030 ltr.

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Iowa Electric Light and Power Company

December 28, 1989  
NG-89-3625

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

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Response to NRC Generic Letter 89-10,  
"Safety-Related Motor-Operated Valve  
Testing and Surveillance"  
Reference: Letter, S.D. Floyd to F.J. Miraglia,  
BWROG-8978, October 30, 1989.  
File: A-101b

Dear Dr. Murley:

Generic Letter (GL) 89-10 requires that each licensee advise the NRC that the schedule and recommendations of the GL will be met. Since receipt of the GL, we have identified preliminarily the set of systems and valves to be included in the GL motor-operated valve (MOV) program and we are currently developing a program plan which will address each item of the GL within the recommended time frame. This program will incorporate the two-stage approach as discussed in item f. of the GL which allows use of current analytical methods to determine switch settings if no design-basis test information for a valve is available. This approach will allow us to immediately develop testing programs for those valves that can be tested in-situ and to determine and implement conservative switch setting methodologies for those valves that cannot be tested in-situ. When the results of ongoing industry research programs are available, they may be used to refine our analytical model and change switch settings if necessary.

We are participating with the BWR Owners' Group in developing a scope of systems and components, range of events, and set of assumptions to form a sound technical basis for responding to this Generic Letter. As stated in the referenced letter, the BWROG generic position is scheduled to be completed in November 1990. Therefore, we are unable to define fully or finalize the scope and schedule of our GL 89-10 program at this time. We will do so after the BWROG generic program is complete.

Upon approval of the BWROG generic program, the schedules for our MOV program will be incorporated in the Semi-Annual Update to the Integrated Plan. Deviations from GL recommendations or schedules will be documented and forwarded to the NRC staff as required by item 1. of the GL.

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Dr. Thomas E. Murley  
December 28, 1989  
NG-89-3625  
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Please contact this office if you have any questions regarding this matter.

Very truly yours,



Daniel L. Mineck  
Manager, Nuclear Division

DLM/PMB/pjv+

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