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

SUBJECT: Provides notification of change in schedule to revise instrument range for Reg Guide 1.97, Variable C-12 CDCC.

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Iowa Electric Light and Power Company

March 19, 1990
NG-90-0626

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
RG 1.97 Schedule Change
Reference: (1) D.L. Mineck letter to T.E. Murley dated 05/03/1989
(NG-89-0057)
(2) R.W. McGaughy letter to H. Denton dated 07/03/85
(NG-85-2423).
File: A-370, A-278

Dear Dr. Murley:

This letter provides the NRC with written notification of a change in our schedule to revise the instrument range for Regulatory Guide (RG) 1.97 Variable C-12 (Containment and Drywell Oxygen Concentration). Additionally, a discrepancy regarding the instrument range for Variable C-11 (Containment and Drywell Hydrogen Concentration) from that previously committed to has also been identified. We have discussed the status of our implementation of these variables with your Staff.

As described in Reference 1, measurement of drywell oxygen concentration from 0 - 10% was originally scheduled to be implemented in the mid-cycle MSIV outage, which was held in the Fall of 1989. Due to concerns regarding the potential adverse effects of increasing the range of this instrument from its current 7% to 10%, the modification of the instrument response range was postponed until a Special Test Procedure could be written to accurately determine the instrument's sensitivity and response at the expanded range. Because it is preferable to perform this special test when the instruments are not required to support plant operation, we propose to implement the expanded oxygen indicating range prior to the end of the next refueling outage, currently scheduled to begin in June, 1990.

The delay in our notification of the NRC regarding this change to a scheduled commitment was caused by a commitment tracking program software error, which has since been resolved. A contributing factor was personnel error in that, while the overdue commitment was tracked internally, the NRC was not promptly notified. The modifications to the commitment tracking software, however, will also help to prevent oversights of this nature.

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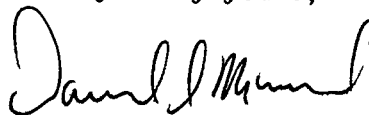
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Dr. Thomas E. Murley
March 19, 1990
NG-90-0626
Page 2

During our work with the oxygen monitoring instrumentation, a similar problem with instrument accuracy has been identified with the RG 1.97 Variable C-11, Containment and Drywell Hydrogen Concentration. In Reference 2, we stated that we would provide measurement of hydrogen concentrations from 0 - 20% to meet the RG 1.97 recommendations for Variable C-11. While the hydrogen instrument has an indicating range of 0 - 20%, we have determined that it can accurately measure only hydrogen concentrations between 0 - 4%. Therefore, we propose to include this instrument in the Special Test described above and implement the required range of 0 - 20% during the next refueling outage.

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

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/PMB/pjv+

cc: P. Bessette
L. Liu
L. Root
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J. R. Hall (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
Commitment Control