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 AUTH. NAME AUTHOR AFFILIATION
 MINECK, D.L. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DAVIS, A.B. Region 3, Ofc of the Director

SUBJECT: Requests approval of 900402 request for exemption from requirement of 10CFR50, App J by 900615.

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Iowa Electric Light and Power Company

May 25, 1990
NG-90-1377

Mr. A. Bert Davis
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
As-Found Local Leak Rate Testing of Main Steam
Isolation Valves
Reference: Letter from D. Mineck (Iowa Electric) to
T. Murley (NRC) dated April 2, 1990 (NG-90-0833)
File: A-103, A-289g, N-11

Dear Mr. Davis:

In the referenced letter, we submitted a request for exemption from the requirement of 10CFR50, Appendix J to conduct a Type A Containment Integrated Leak Rate Test (CILRT) during the 1990 refueling outage at the Duane Arnold Energy Center (DAEC). We provided our Corrective Action Plan for the Main Steam Isolation Valves (MSIVs) which is intended to improve MSIV Local Leak Rate Test (LLRT) performance and overall MSIV reliability. All eight MSIVs will be disassembled during the 1990 refueling outage and the modifications described in our Corrective Action Plan will be installed.

The Iowa Electric Quality Assurance Program is committed to following the guidance of ANSI N18.7-1976 which, in Section 5.3.10, can be interpreted to require us to conduct "as-found" LLRTs of the MSIVs. We propose to take exception to this commitment on a one-time-only basis during the 1990 refueling outage. Justification for not performing "as-found" LLRTs for the MSIVs is given below.

Appendix J to 10CFR50 identifies two purposes for performing leak rate tests. The first purpose is to assure that leakage through primary containment and systems and components penetrating the primary containment does not exceed

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allowable leakage rate values. "As-found" testing is not required by this regulation. This purpose will be satisfied by conducting "as-left" LLRTs of the MSIVs after the modifications described in our Corrective Action Plan have been installed.

The second purpose of leak rate testing is to assure that periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment and systems and components penetrating primary containment. Thus, the "as-found" LLRTs are intended to be used to determine whether or not maintenance on a particular valve is needed. All eight MSIVs at the DAEC will be modified during this outage regardless of the results of "as-found" LLRTs. Therefore, performance of the "as-found" LLRTs is not required to satisfy this purpose.

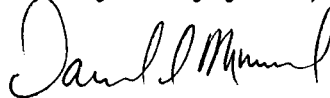
Failure to meet the LLRT acceptance criteria is merely a symptom of a problem in a valve. It does not provide any useful information as to the root cause of the problem. The root cause is determined only after valve disassembly and careful inspection of internal components. In the past, the extensive measurements of the valve internals have been made at the DAEC and the information has been used effectively by the DAEC staff to determine the appropriate corrective actions to be taken to improve MSIV performance. These measurements and not LLRT results provide the basis of the MSIV preventive and predictive maintenance programs at the DAEC. These programs have been discussed in detail with your staff and are also described in our Corrective Action Plan. These measurements will be taken again this refueling outage (in the "as-found" condition) to complete collection of the historical information on the present MSIV configuration and to provide the dimensions required to implement the valve modifications. The extent of the valve modifications to be installed this outage will establish essentially new baseline dimensions of the valve internal components, thus previous measurements become historical information only and will not be particularly useful for future trending of valve performance. Thus, we can conclude that the results of "as-found" LLRTs during the 1990 refueling outage will be of no use to us or the BWR industry as a whole.

Other benefits of not performing "as-found" MSIV LLRTs are a savings of approximately 36 hours of outage critical path time and avoiding approximately 200 mrem of exposure to personnel performing the tests.

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The 1990 refueling outage is currently scheduled to begin on June 28, 1990. We request approval of our proposed actions by June 15, 1990 so that we can finalize our outage plans. Should you have any further questions or concerns regarding this matter, please contact this office.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/NKP:DMB*

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