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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH.NAME AUTHOR AFFILIATION
 MINECK, D.L. Iowa Electric Light & Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Confirms that planned activities completed & program for maintaining proper instrument air quality in place.

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Iowa Electric Light and Power Company

November 8, 1990
NG-90-2517

Dr. Thomas E. Murley
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: 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 88-14,
"Instrument Air Supply System Problems
Affecting Safety Related Equipment"
Reference: Letter from D. Mineck (Iowa Electric) to
Dr. Murley (NRC) dated February 21, 1989
(NG-89-0347)
File: A-101b, A-107a

Dear Dr. Murley:

NRC Generic Letter 88-14 requested that each licensee review NUREG 1275, Volume 2, "Operating Experience Feedback Report - Air Systems Problems", and perform a design and operations verification of the instrument air system. In the referenced letter, we informed you of the steps we have taken to perform this verification and stated that the remaining activities would be completed prior to startup from the 1990 refueling outage.

This letter confirms that the planned activities have been completed and our program for maintaining proper instrument air quality is in place. All planned modifications of the air system, including the installation of a new air dryer and in-line dewpoint monitor, have been completed. The operating and annunciator response procedures have been updated to include operation of this new equipment. The instrument air system blowdown and air quality (dew point, particulate and oil content) testing programs were implemented and continue to verify that the air quality is consistent with manufacturers' recommendations.

The testing program developed to verify that air-operated safety-related components will perform their safety-related function upon loss of their normal air supply was successfully completed. All safety related components performed as designed. However, the change to the abnormal operating procedure for the loss of instrument air event mentioned in the referenced letter was not implemented. Our review of this abnormal operating procedure determined that it already provides sufficient guidance to operators in the event components do not fail in their required position.

Many of the recommendations resulting from our evaluation of the instrument air maintenance program have been incorporated into the DAEC preventative maintenance program. However, since many of the smaller components in the instrument air

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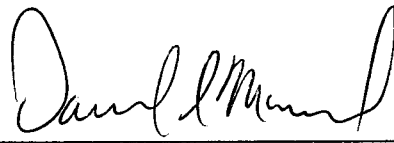
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system do not have unique equipment identification numbers, they have not yet been added to the preventative maintenance program. Plant walkdowns have been completed and all such components have been identified. As permanent plant identification numbers are assigned, these components will be added to the preventative maintenance program.

Iowa Electric recognizes the importance of maintaining the quality and reliability of the instrument air system. As described in LERs 90-002 and 90-015, two manual scrams were initiated in response to reactor vessel water level control difficulties caused by the loss of instrument air. While all components supplied by the air system responded as designed to the loss-of-air transient, these two events highlight the importance of our on-going maintenance and test programs in ensuring the continued operability and satisfactory performance of the instrument air system.

This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By 
DANIEL L. MINECK
Manager, Nuclear Division

State of Iowa
(County) of Linn

Signed and sworn to before me on this 9th day of November, 1990,
by Daniel L. Mineck.


Notary Public in and for the State of
Iowa

9-28-92
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