

Iowa Electric Light and Power Company

Attachment to
NG-91-1745

July 19, 1991

NG-91-1594 Revision 1

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
Commitment for the Trending, Inspection, Repair, and
Root Cause Analysis of Main Steam Isolation Valve
CV-4419

Reference: Letter, D. L. Mineck (Iowa Electric) to Dr. T.E. Murley
(NRC) dated December 14, 1990, NG-90-2839

File: A-117, N-11

Dear Dr. Murley:

On May 24, 1991 we received a Temporary Waiver of Compliance (TWOC) from the DAEC Technical Specification (TS 4.7.D.1.c) requirement to exercise the Main Steam Isolation Valves (MSIVs) at least once per week by partial closure. The Waiver became necessary to avoid potential further damage to one MSIV (CV-4419) which had exhibited signs of stem galling and packing leakage on May 19, 1991. We had previously (December 14, 1990) requested a change in Technical Specifications deleting the requirements of TS 4.7.D.1.c. The TWOC is to remain in effect until this proposed TS change can be acted on by the NRC.

Your staff has asked us to confirm that we will take measures to detect any further degradation of the valve prior to its becoming inoperable and will take actions at the next refueling outage to correct the problem prior to restart. The following actions will be taken in order to maintain a high degree of reliability for MSIVs at the DAEC.

We will use the results of the quarterly fast closure test required by TS 4.7.D.1.b(2) to trend the opening and closing stroke time of MSIV CV-4419 to detect any further degradation. We will evaluate steam tunnel temperatures for significant change on a daily basis and trend these temperatures on a weekly basis until the next refueling outage (Cycle 11/12) currently scheduled to begin March 2, 1992. Steam tunnel temperatures are routinely read once per day. The daily evaluation and weekly trending of these readings will enable us to monitor any changes in steam tunnel temperature. Changes in steam tunnel temperature

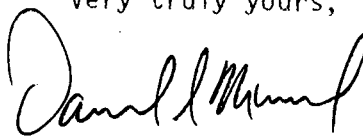
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Dr. Thomas E. Murley
July 19, 1991
NG-91-1594 Revision 1
Page 2

may indirectly indicate further degradation of MSIV CV-4419. Also, routine inspections of the steam tunnel area will provide us an alternate opportunity to detect any noticeable increases in steam leakage from this valve. However, due to ALARA and personnel safety concerns detailed visual inspections will not be performed unless there are other indications of further degradation due to stem galling before the next refueling outage. We will inspect and repair the MSIV in question during the next refueling outage. A root cause analysis of this problem will be performed prior to the Cycle 12 startup in order to determine whether any additional corrective actions need to be taken to minimize the potential for recurrence of this problem.

If you have any questions regarding this matter, please contact this office.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/DJM/pjv+

cc: D. Mienke
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NRC Resident Office