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 MURLEY, T.E.      Office of Nuclear Reactor Regulation, Director (Post 870411) R

SUBJECT: Forwards Suppl 1 to Rev 12 of QA Program Description, per I  
 comments addressing updated FSAR Section 17.2.2.3 re D  
 identification of safety-related structures, sys, components &  
 items & updated FSAR Section 3.2. S

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Iowa Electric Light and Power Company

QUALITY ASSURANCE

August 27, 1991

NG-91-2562

RICHARD W. MCGAUGHY  
VICE PRESIDENT, PRODUCTION

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  
Operating License DPR-49  
Reporting of Changes to the Quality  
Assurance Program Description,  
UFSAR 17.2 Revision 12, Supplement 1

Reference: 1) Letter from R. W. McGaughy (Iowa  
Electric) to Dr. Thomas E. Murley  
(NRC - Nuclear Reactor Regulation) of  
June 28, 1991 (NG-91-1422).  
2) Letter from D. L. Mineck (Iowa  
Electric) to Dr. Thomas E. Murley  
(NRC - Nuclear Reactor Regulation) of  
July 1, 1991 (NG-91-1604).

File: A-116, A-365, Q-98

Dear Mr. Murley:

This letter transmits Supplement 1 to the latest revision (12) of the Quality Assurance Program Description (QAPD) for the Duane Arnold Energy Center, the Reference (1) document which was submitted in accordance with 10 CFR 50.54(a)(3) and 10 CFR 50.71(e).

Preparation of Supplement 1 was prompted by comments provided by Mr. Fred Maura during his review of the Reference (1) document and from a subsequent meeting held at the NRC Region III offices on August 26, 1991. These comments address UFSAR Section 17.2.2.3, "Identification of Safety-Related Structures, Systems, Components, and Items", and UFSAR Section 3.2 to which Section 17.2.2.3 refers.

Those comments generally resulted from differences in content and arrangement between revised UFSAR Section 3.2 (submitted to NRC with Reference (2)) and its predecessor. These differences are the result of completing one phase of the design basis reconstruction project. The format used for revised UFSAR Section 3.2 is based on the General Electric BWR 4/5/6 Standard

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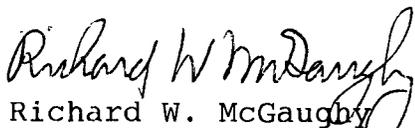
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Safety Analysis Report (GESSAR), Section 3.2, "Classification of Structures, Systems, and Components", and General Electric document NEDC-31853P, "Duane Arnold Design Safety Standards", Appendix A, "Equipment Design Criteria".

In order to resolve those comments regarding the "Identification of Safety-Related Structures, Systems, Components", we submit Attachment 1 which contains a revised UFSAR Section 17.2.2.3. Revised Section 17.2.2.3 incorporates an Appendix B to UFSAR Section 17.2 which makes certain corrections to the UFSAR Section 3.2 submitted by Reference (2) with respect to the applicability of the QA Program and seismic classification. A subsequent revision to the UFSAR will change Section 3.2 to incorporate the corrections now being made through Section 17.2 Appendix B, and will remove Appendix B.

Attachment 2 to this submittal is supplemental discussion of changes shown in Reference (1) about which Mr. Maura had commented on the classification of structures, systems and components. This supplemental discussion includes the description of changes; the reason for changes; and the basis for concluding that these changes continue to satisfy the criteria of 10 CFR 50, Appendix B and the Quality Assurance Program Description commitments previously accepted by the NRC.

Very truly yours,



Richard W. McGaughey  
Vice President - Production

RWM/KEP/dkb

- Attachments: 1) UFSAR/DAEC-1, Chapter 17.2, Revision 12, Supplement 1  
2) Discussion of Changes in the Quality Assurance Program Description

cc: K. Peveler  
L. Root  
L. Liu  
D. Mineck  
A. Bert Davis (NRC - Region III)  
C. Shiraki (NRC - NRR)  
NRC Resident Office

## 17.2.2 OPERATIONAL QUALITY ASSURANCE PROGRAM

### 17.2.2.1 Scope

Iowa Electric has established an Operational Quality Assurance Program that applies to those structures, systems, and components, that are safety-related and those activities that affect those structures, systems, and components that are safety-related. Safety-related structures, systems, and components are those that ensure the integrity of the reactor coolant pressure boundary, shut down the reactor, and maintain the reactor in a safe shut down condition, or prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public.

### 17.2.2.2 Basis

10 CFR Part 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, and certain regulatory guides, form the basis for the Operational Quality Assurance Program. Appendix A to UFSAR Chapter 17.2 identifies the particular regulatory guides to which Iowa Electric is committed and which are included in the basis for the Operational Quality Assurance Program.

### 17.2.2.3 Identification of Safety-Related Structures, Systems, Components and Items

The pertinent requirements of the Operational Quality Assurance Program apply to all activities affecting the safety-related functions of those structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. A current list of safety-related structures, systems and components is contained in Section 3.2 of the DAEC Updated Final Safety Analysis Report. This list includes structures, systems, and components identified during the design and construction phase and may be modified as required during operations consistent with their importance to safety.

Appendix B to UFSAR 17.2 supplements UFSAR 3.2, correcting certain entries in Table 3.2-1 with respect to the applicability of the QA Program and the seismic classification. Table 3.2-1 will be revised in the next UFSAR update and Appendix B to Section 17.2 will be removed.

The list of safety-related structures, systems and components from Section 3.2 of the DAEC Updated Final Safety Analysis Report is further defined in data bases through the assignment of plant specific unique identifiers. These data bases include items in addition to safety-related structures, systems and components and are maintained by the Manager, Design Engineering.

UFSAR/DAEC-1  
17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE  
APPENDIX B  
REFERENCE UFSAR TABLE 3.2-1

UFSAR  
TABLE 3.2-1  
ITEM NO.

<u>ITEM NO.</u>	<u>DESCRIPTION</u>	<u>QA</u>	<u>SEISMIC</u>
VI	<u>Neutron Monitoring System</u>		
VI, 3	Electrical Modules, IRM and APRM*	B	I
	*This item includes the 24 volt D.C. Power System		
XXVIII	<u>Pneumatic Systems</u>		
XXVIII, 1	Nitrogen Vessels, Accumulators, Supporting Safety Related Systems	B	I
XXVIII, 2	Nitrogen piping and valves in lines between above accumulators and safety- related systems	B	I
XXVIII, 3	Nitrogen piping and valves forming part of containment boundary	B	I
XXVIII, 4	Instrument air vessels, accumulators, supporting safety-related systems	B	I
XXVIII, 5	Instrument air piping and valves in lines between above accumulators and safety-related systems	B	I

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UFSAR  
TABLE 3.2-1  
ITEM NO.

<u>ITEM NO.</u>	<u>DESCRIPTION</u>	<u>QA</u>	<u>SEISMIC</u>
XXIX	<u>Diesel Generator System</u>		
XXIX, 9	Diesel Air Start System	B	I
XXXIII	<u>Power Conversion System</u>		
XXXIII, 1	Main Steam Piping from Outboard MSIV to turbine stop valves and branch line piping up to and including first valve	B	I
XXXX	<u>Miscellaneous Components</u>		
XXXX,2	Containment Penetrations, Process Piping and Electrical	B	I

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17.2.2.3 Identification of Safety-Related Structures, Systems, Systems, Components and Items  
Appendix B UFSAR Table 3.2-1 Issues  
to 17.2

**Identification of Change:**

Paragraph 17.2.2.3 is revised to recognize the addition of Appendix B to UFSAR 17.2 to correct certain aspects of the Operational Quality Assurance Program relating to "Quality Assurance Requirements" and "Seismic Category" as contained in UFSAR Section 3.2. This Appendix B supplements UFSAR 3.2 on an interim basis.

**Reason for the Change:**

UFSAR Section 3.2 contains some discrepancies regarding the requirements for "Quality Assurance Requirements" and "Seismic Category". Addition of Appendix B provides for the immediate implementation of these parameters in the Operational Quality Assurance Program. The next annual revision of the UFSAR will revise Section 3.2 to incorporate these items and delete Appendix B from Section 17.2.

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

The design basis reconstruction effort has resulted in the generation of a more comprehensive document called "Classification of Structures, Systems, and Components" than previously existed. This new design basis document is very complex and certain additions/clarifications are necessary. These changes relate to the identification of "Quality Assurance Requirements" and "Seismic Category". They are improvements in definition and scope of the Operational Quality Assurance Program.

In conclusion, the revised UFSAR Section 3.2 (submitted on 7-1-91) combined with UFSAR 17.2 Appendix B, which is being added by the present submittal, is a significant improvement in the definition and scope of the Operational Quality Assurance Program at the DAEC. These changes are consistent with the implementation of 10 CFR Part 50, Appendix B, and the Quality Assurance Program commitments previously accepted by the NRC.

UFSAR Table 17.1-3 Emergency Diesel-Generators Housing and Supports

Identification of the Change:

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3 is entitled "Safety-Related Items." The "Civil Structural" section lists "Emergency diesel-generators, housing and supports." The revised UFSAR Section 3.2, Table 3.2-3 lists "Turbine Building (portion containing emergency diesel generators)."

Reason for the Change:

As part of the IE design basis reconstruction effort, a revised UFSAR Section 3.2 has been developed for the classification of structures, systems, and components. The format for UFSAR Section 3.2 is based on the BWR 4/5/6 Standard Safety Analysis Report (GESSAR), Section 3.2 "Classification of Structures, Systems and Components", and NEDC-31853P, "Duane Arnold Design Safety Standards", Appendix A, "Equipment Design Criteria." This new format is a standardized format, however, the level of detail may vary from the previous UFSAR.

Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):

The structure housing the emergency diesel generators and related supports is the Turbine Building. The revised UFSAR Section 3.2, Table 3.2-3, now specifically identifies the Turbine Building as the structure which houses the emergency diesel generators. This includes the supports as stated in UFSAR Section 3.2.4, "Supports shall be in the same class as the component supported." This represents a change in nomenclature only. The DAEC Quality Assurance Program continues to be applied to the structure housing the emergency diesel generators and supports. This change continues to satisfy the requirements of 10 CFR Part 50, Appendix B and the Quality Assurance Program Description commitments previously accepted by the NRC.

UFSAR Table 17.1-3, "Auxiliary Structures Housing Engineered Safeguard Systems"

Identification of the Change:

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items", lists "Auxiliary structures housing engineered safeguard systems" under the descriptive heading of "Civil Structural." The revised UFSAR Table 3.2-3 contains a list of "Seismic Category I Structures".

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

UFSAR Table 17.1-3 lists "Auxiliary structures housing engineered safeguard systems" as a "Civil Structural" category to which the total Quality Assurance Program applies.

The revised UFSAR Table 3.2-3 specifically identifies the list of structures which are required to be maintained as Seismic Category I Structures. This list includes auxiliary structures. As defined by UFSAR Section 3.2, Paragraph 3.2.1, "Seismic Classification", Category I structures are designed to withstand the effects of a Safe Shutdown Earthquake (SSE) and remain functional. UFSAR Table 3.2-3 specifically identifies the structures which are Seismic Category I and to which the Quality Assurance Program applies. This listing is more specific than that previously provided but continues to apply to auxiliary structures housing engineered safeguard systems. Therefore, this change continues to satisfy the requirements of 10 CFR Part 50, Appendix B and the Quality Assurance commitments previously accepted by the NRC.

**UFSAR Table 17.1-3 Supports for Engineered Safeguard System Components**

**Identification of the Change:**

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items" lists, "Supports for engineered safeguard system components" in the Civil Structure section. The revised UFSAR Section 3.2, Table 3.2-1 is more specific, listing specific essential components. By definition, the inclusion of a component in Table 3.2-1 includes its associated supports.

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3 "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

UFSAR Table 17.1-3 identifies generically "Supports for Engineered Safeguard System Components" as a class to which the Quality Assurance Program applies.

The revised UFSAR Table 3.2-1 identifies the specific components which must be seismically supported by references in the Column, "Seismic Category" to footnotes "e" and "f". This is further supported by Paragraph 3.2.4, "Safety Classes" which states: "(Supports shall be in the same class as the component supported)."

This change does not alter the application of the QA Program to "Supports for Engineered Safeguard Systems" and involves no reduction in any commitment previously approved by the NRC.

#### UFSAR Table 17.1-3 Spent-Fuel Pool

##### **Identification of the Change:**

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items", lists "Spent Fuel Pool" in the section entitled "Civil Structural." The revised UFSAR Section 3.2.4.2, Paragraph 3.2.4.2.1(1), "Safety Class 2", refers to "Spent Fuel Storage Racks and Spent Fuel Pool."

##### **Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3 "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

UFSAR Section 3.2.4.2.1(1) includes the Spent Fuel Pool as safety related and specifies that it is Safety Class 2. In addition, the Spent Fuel Pool is a structural item within the Reactor Building. The Reactor Building is listed as a seismic structure in revised UFSAR Table 3.2-3. Thus, the requirements of 10 CFR 50, Appendix B continue to apply and the change is consistent with the Quality Assurance Program Description commitments previously accepted by the NRC.

### UFSAR Table 17.1-3 Steam Line Flow Restrictor

#### Identification of the Change:

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items", contains a section entitled "Nuclear Boiler System" in which "Steam line flow restrictor" is listed. UFSAR Table 3.2-1, Principal Component Section II, "Nuclear Boiler System B21", Item 14, identifies "Mechanical modules, instrumentation, with safety function", which includes the steam line flow restrictors.

#### Reason for the Change:

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

#### Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):

As specified by UFSAR Table 17.1-3, the Iowa Electric Quality Assurance Program was applied to the steam line flow restrictors. Principal Component II, "Nuclear Boiler System B21", Item 14 (Mechanical modules, instrumentation, with safety function) in UFSAR Table 3.2-1 also includes the main steam line flow restrictors. Footnote 1c to item I4 states in part: "Mechanical modules include turbines, strainers and orifices." Therefore, the Quality Assurance Program continues to apply to the main steam line flow restrictors consistent with the provisions of 10 CFR Part 50, Appendix B, and the commitments previously accepted by the NRC.

### UFSAR Table 17.1-3 Refueling Floor Exhaust Ventilation Monitors

#### Identification of the Change:

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items", contains a section entitled "Reactor Radiation Monitoring System" which lists "Refueling floor exhaust ventilation monitors." In UFSAR Table 3.2-1, Principal component VIII, "Process Radiation Monitors", contains as Item 1 "Electrical modules for main steam line, reactor building ventilation and offgas stack monitors." This item includes the "refueling floor exhaust ventilation monitors."

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

The refueling floor is within the reactor building. Section VIII of UFSAR Table 3.2-1 identifies the reactor building ventilation and offgas stack monitors. This item includes the refueling floor exhaust ventilation monitors. Therefore, the Quality Assurance Program continues to be applied to the refueling floor exhaust ventilation monitors, consistent with the provisions of 10 CFR Part 50, Appendix B and the Quality Assurance Program Description commitments previously accepted by the NRC.

**UFSAR Table 17.1-3, "Rod Block Monitor"**

**Identification of the Change:**

Revised UFSAR Section 3.2, "Classification of Structures, Systems and Components", does not list the Rod Block Monitor although it is listed in UFSAR Table 17.1-3 in the "Neutron Monitoring System" section.

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

The Rod Block Monitor subsystem of the Neutron Monitoring system is listed in UFSAR Table 17.1-3. However, the Rod Block Monitor subsystem is not safety related and has no Safety Design Basis.

General Electric topical report APED-5706, "In-Core Neutron Monitoring System for General Electric Boiling Water Reactors" (April 1969 revision) states on page 54 "RBM has no reactor protection outputs." General Electric Design Specification for DAEC et.al. 22A1473, "Neutron Monitoring System" Section 4.8 Rod Block Monitor (RBM) (Rev. 6, 11/19/74) states "The Rod Block Monitor (RBM) shall be designed to provide information about the local core power level in the vicinity of a control rod that has been selected for withdrawal or insertion and provide alarm signals used to inhibit rod withdrawal if the local power level

reaches a predetermined level." FSAR Section 7.5.8.1 states the Power Generation Design Basis for the RBM. There is no Safety Design Basis for the RBM in the FSAR. FSAR Appendix M, Section M.3.2 is the Iowa Electric response to NRC Information Request No. 2, Response Item 1b. "Neutron Monitoring System (portion that does not supply signals to the RPS system)." "These systems are operational control systems and are not to be confused with protection systems as defined in the response to information guide." Therefore, we have concluded that it was an error to list the RBM in Table 17.1-3.

In conclusion, the scope of the Quality Assurance Program does not include the RBM. Based on the previous content of UFSAR Table 17.1-3, this is an apparent reduction in commitment. However, as described above, the RBM subsystem is not safety related and as such is not required to be included within the scope of the DAEC QA Program. The QA program continues to be consistent with the requirements of 10 CFR 50, Appendix B, and is therefore acceptable.

UFSAR Table 17.1-3, "Drywell Sumps Isolation Valves"

Identification of the Change:

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items," contains a section entitled "Radwaste System" which identifies "Drywell sumps isolation valves." The revised UFSAR Table 3.2-1 contains Principal Component XVIII "Radwaste system," of which Item 3 is "Piping and valves, containment isolation."

Reason for the Change:

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):

The drywell sumps isolation valves are included within the category of radwaste system containment isolation valves. This is a change in nomenclature only, and the drywell sumps isolation valves are still included within the scope of the Quality Assurance Program. As revised, this item continues to satisfy the requirements of 10 CFR Part 50, Appendix B and the Quality Assurance Program description commitments previously accepted by the NRC.

UFSAR Table 17.1-3, "Standby Gas Treatment System"

**Identification of the Change:**

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3, "Safety Related Items," contains a section entitled "Standby Gas Treatment System" which lists "Fans and filters," "Ductwork," and "Valves." UFSAR Table 3.2-1 Principal Component XXXI, "Standby Gas Treatment System," contains Item 1, "All components with safety function."

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

The fans, filters, ductwork and valves of the standby gas treatment system which provide a safety function are included in Item 1 of Section XXXI of revised UFSAR Table 3.2-1. Specific components in the Standby Gas Treatment System which have safety functions are identified by DAEC unique identifiers and placed in the data base maintained by Design Engineering in accordance with UFSAR 17.2.2.3, "Identification of Safety-Related Structures, Systems and Components." The Quality Assurance Program continues to apply to the fans, filters, ductwork and valves in the Standby Gas Treatment System which are safety related (i.e., have safety functions). Therefore, as revised, this item continues to satisfy the requirements of 10 CFR Part 50, Appendix B and the Quality Assurance Program Description commitments previously accepted by the NRC.

UFSAR Table 17.1-3 "Local Power Range Monitor"

**Identification of the Change:**

UFSAR Table 17.1-3 listed the "Local Power Range Monitor" as a safety related item under the Neutron Monitoring system. In the development of the revised UFSAR Section 3.2, "Classification of Structures, Systems, and Components", the Local Power Range Monitor (LPRM) is not listed explicitly; however, the LPRMs are covered under Item I.10, "Power Range Detector Hardware" in UFSAR Table 3.2-1.

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54**

The Local Power Range Monitor system is listed in UFSAR Table 17.1-3 which indicates that the Quality Assurance Program was applied to it during construction, however, UFSAR Section 7.6.1.6 states, "No safety design bases are specified for the Local Power Range Monitors: however, since they form inputs to the APRM subsystem, a minimum number of these monitors must be operable for each average power range monitor (APRM) as defined in the APRM safety design basis." The LPRM subsystem has no safety design basis as it has no safety function of its own. The only portion of the LPRM subsystem that should have been classified as safety related in 17.1-3 is that which is part of the reactor coolant pressure boundary. This item is the Power Range Detector hardware that is identified in revised UFSAR Table 3.2-1 Item I.10. Iowa Electric has consistently applied the Quality Assurance Program to those portions of the Neutron Monitoring system and LPRM subsystem that are safety related. There is no change in the application of the requirements of 10 CFR Part 50, Appendix B, and the revision is consistent with the Quality Assurance Program description commitments previously accepted by the NRC.

UFSAR Table 17.1-3, "Ventilation Systems"

**Identification of the Change:**

Table 17.1-3 of the Updated Final Safety Analysis Report (UFSAR) contains a section entitled "Ventilation Systems." Within that section are identified the "HPCI Room," "RHR Core Spray Rooms," and "RCIC Room." The revised UFSAR Table 3.2-1 contains Principal Component XXXII, "ECCS Equipment Area Cooling System" with Item 1 "All Components with Safety Functions."

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

The Ventilation Systems for the HPCI Room, RHR Core Spray Rooms and RCIC Room are included in the "ECCS Equipment Area Cooling Systems" portion of the revised UFSAR Section 3.2, Table 3.2-I, Principal Component Section XXXII. As specified in UFSAR Section 17.2.2.3, "the list of safety-related structures, systems and components from Section 3.2 of the DAEC Updated Final Safety Analysis is further defined in data bases through the assignment of plant specific unique identifiers." The systems and corresponding components are specified in greater detail in those data bases maintained by Design Engineering. Therefore, this change does not affect application of the requirements of 10 CFR Part 50, Appendix B and the Quality Assurance Program Description commitments previously reviewed and accepted by the NRC remain in effect.

**UFSAR Table 17.1-3 Offgas Stack Dilution Fans**

**Identification of the Change:**

The Updated Final Safety Analysis Report (UFSAR) Table 17.1-3 contains a section entitled "Standby Gas Treatment System" which identifies "Offgas Stack Dilution Fans." The revised UFSAR Table 3.2-1 contains Principal Component XXIII, "Offgas System," Item 7, "Mechanical Modules, with Safety Function."

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54 (a)(3):**

The Offgas Stack Dilution Fans are part of the Offgas System and are included within the scope of the Operational Quality Assurance Program by virtue of Item 7 (Mechanical Modules with safety function) in UFSAR Table 3.2-1, Section XXIII, "Offgas System." This item is further defined by footnote (1c) which states: "A module is an assembly of interconnected components which constitute an identifiable device or piece of equipment. For example, electrical modules include sensors, power supplies, and signal processors. Mechanical modules include turbines, strainers, and orifices." This list does not specifically identify "fans", but the listed components are examples only. This level of detail is less specific than that contained in UFSAR Table 17.1-3, however, the Iowa Electric

equipment data base maintains the safety classification status for the equipment installed at the DAEC, in greater detail. This is consistent with the content of UFSAR Section 17.2.2.3. This data base specifically includes the Offgas Stack Dilution Fans within the scope of the Quality Assurance Program.

In conclusion, the Offgas Stack Dilution Fans remain within the scope of the DAEC Operational Quality Assurance Program. Therefore, the provisions of 10 CFR Part 50, Appendix B continue to be applied in the same way and consistently with the previous Operational Quality Assurance Program commitments reviewed and approved by the NRC.

#### UFSAR Table 17.1-3, "Diesel Air-Start System"

##### Identification of the Change:

UFSAR Table 17.1-3 listed the "Diesel Air-Start System" as a safety related item under Standby Diesel Generation. In the development of revised UFSAR Section 3.2, "Classification of Structures, Systems, and Components," the "Diesel Air Start System" is not listed. "Diesel Air Start System" is added to UFSAR 17.2 Appendix B. A subsequent revision to the UFSAR will change Section 3.2 to incorporate the corrections now being made through Section 17.2, Appendix B, and will remove Appendix B.

##### Reason for the Change:

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports".

##### Basis for Concluding that the Change is Acceptable Under Section 50.54:

The Diesel Air Start System is listed in UFSAR Table 17.1-3 which indicates the Quality Assurance Program during construction was applied to the Diesel Air Start System. Since the "Diesel Air Start System" was not separately listed under the GESSAR format, it has been added to Section XXIX, Item 9 in UFSAR 17.2 Appendix B for specific inclusion in the Quality Assurance Program scope. Iowa Electric has consistently applied the Quality Assurance Program to this system in the past and will continue to do so in the future. A list of safety-related structures, systems and components from Section 3.2 of the DAEC UFSAR is further defined in data bases at Iowa Electric through the assignment of plant specific unique identifiers. This data base, maintained by Design Engineering, lists the diesel air start components as safety related for those components that were originally designed, procured and installed as safety related. The

requirements of 10 CFR Part 50, Appendix B, continue to apply and the program continues to be consistent with the Quality Assurance Program description commitments previously accepted by the NRC.

UFSAR Table 17.1-3, "Main Steam Piping Up to the Turbine Stop Valves"

Identification of the Change:

UFSAR Table 3.2-1 previously identified the "Main Steam Piping Up to the Turbine Stop Valves" as being a Seismic Category I system. The revised UFSAR 3.2 identifies this system under Principal Component XXXIII, "Power Conversion System", Item 1, "Main steam piping from outboard MSIV to turbine stop valves and branch line piping up to and including the first valve."

Reason for the Change:

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):

The "Main Steam Piping Up to the Turbine Stop Valves" remains within the scope of the Quality Assurance Program as specified in UFSAR Table 3.2-1, Section XXXIII, "Power Conversion System", Item 1. The DAEC Quality Assurance program continues to apply to this piping. Therefore, the requirements of 10 CFR Part 50, Appendix B continue to be met and the Quality Assurance commitments previously accepted by the NRC remain unchanged.

UFSAR Table 3.2-1, "Containment Penetrations"

Identification of the Change:

UFSAR Table 3.2-1 previously contained an item identified as "Containment Penetrations." The revised UFSAR 3.2-1 does not contain a specific line item for containment penetrations. Containment penetrations are included in UFSAR 17.2, Appendix B in Section XXXX, Item 2. A subsequent revision to the UFSAR will change Section 3.2 to incorporate the corrections now being made through Section 17.2, Appendix B, and will remove Appendix B.

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54(a)(3):**

Containment penetrations were previously identified in UFSAR 3.2-1 as a specific entry. UFSAR Section 17.2, Appendix B, specifically includes containment penetrations. Therefore, containment penetrations are specifically included within the scope of the Quality Assurance Program.

The scope of the Operational Quality Assurance Program continues to be applied to containment penetrations and therefore remains consistent with the provisions of 10 CFR Part 50, Appendix B and the Quality Assurance Program commitments previously accepted by the NRC.

**UFSAR Table 3.2-1 DC Power System (24 V)**

**Identification of the Change:**

UFSAR Table 3.2-1 previously contained an item identified as "DC Power System (24V)" in the section entitled "Standby Electrical Power Systems." The 24 Volt DC Power System was not specifically listed in the revised UFSAR Table 3.2-1. However, the 24 Volt DC Power System is covered under UFSAR Table 3.2-1, Principal Component Section VI, "Neutron Monitoring System C51", Item 3 "Electrical Modules, IRM and APRM." For clarity, a note regarding the 24 Volt DC Power System has also been placed in UFSAR Section 17.2, Appendix B. A subsequent revision to the UFSAR will change Section 3.2 to incorporate the corrections now being made through Section 17.2, Appendix B, and will remove Appendix B.

**Reason for the Change:**

Refer to explanation of Reason For Change given above in connection with Table 17.1-3, "Emergency Diesel-Generators Housing and Supports."

**Basis for Concluding that the Change is Acceptable Under Section 50.54 (a)(3):**

The Iowa Electric Quality Assurance Program applies to the 24 Volt DC Power System. That system is included in the UFSAR Table 3.2-1, Principal Component VI, "Neutron Monitoring System C51", Item 3 "Electrical Modules, IRM and APRM." An additional footnote to this item (shown in UFSAR Section 17.2, Appendix B) specifically states that the 24 Volt DC Power Supply System is included with the Neutron Monitoring System. Therefore, the Quality Assurance Program continues to apply to the 24 Volt DC Power System consistent with the provisions of 10 CFR Part 50, Appendix B, and the commitments previously reviewed and approved by the NRC remain unchanged.