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 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: Forwards revised request for relief from ASME Section XI requirements for second 10-yr inservice insp plan.

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Murley

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Iowa Electric Light and Power Company

August 30, 1991
NG-91-2600

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station F1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Request for Relief from ASME Section XI
Requirements
Reference: Letter from M. Virgilio (NRC) to L. Liu
(IELP) dated July 7, 1987
File: A-100, A-286

Dear Dr. Murley:

In the referenced letter, your staff informed us that they had reviewed and approved the second 10-year Inservice Inspection Plan and relief requests for the Duane Arnold Energy Center. As part of that application we requested and were granted relief from certain inspections of component interiors (ref. NDE-002). Subsequent to this letter, we have identified the need to revise that relief request. In accordance with 10 CFR 50.55a(a)(3), the attached revised request for relief (NDE-002, Rev. 2) is submitted and we ask that it be approved as a revision to our current Inservice Inspection Plan.

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

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/CJR/pjv*

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Dr. Thomas E. Murley
NG-91-2600
August 30, 1991
Page 2

Attachment: Request for Relief No. NDE-002

cc: C. Rushworth
L. Liu
L. Root
R. McGaughy
C. Shiraki (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
R. West (Iowa Bureau of Boiler Inspection)
Commitment Control No. 850123

DUANE ARNOLD ENERGY CENTER MAJOR ITEM: REQUEST FOR RELIEF NO. NDE-002
 TEN-YEAR EXAMINATION SUMMARY TABLE: SECTION 10
 ASME SECTION XI SYSTEMS -REQUEST FOR EXAMINATION RELIEF- PAGE 1 OF 1

COMPONENT OR ITEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
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Class 1 valve/ bodies exceeding 4 inch
 Nominal Pipe Size

System: Various

(1) Class 1 valves greater than NPS 4	1	1.1	B-M-2	B12.50
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CODE REQUIREMENT

(1) Visual interior examination of one in a group of valves performing the same system function which exceeds 4 inch nominal pipe size.

BASIS FOR RELIEF

The requirement to disassemble the class 1 system valves for the sole purpose of performing a visual examination of the internal pressure boundary surfaces has only a very small potential of increasing plant safety margins and a very disproportionate impact on expenditures of plant manpower and radiation exposure.

Performing these visual examinations, in some cases, under such adverse conditions as high dose rates and poor as-cast surface conditions, realistically provides little additional information as to the valve casing integrity.

The performance of both carbon and stainless cast valve bodies has been excellent in all BWR applications. Based on this experience and both industry and regulatory acceptance of these alloys, continued excellent service performance is anticipated.

Inspection during maintenance activities is allowed by ASME Section XI 1986 Edition with 1988 Addenda revision of the code.

ALTERNATE EXAMINATION

(1)(2) The interior surfaces of class 1 system valves will be examined during maintenance activities and regardless of the inspection period, as per Section XI 1986 Edition 1988 Addenda.

Visual examinations (VT2) required by category B-P will be fulfilled each inspection period (IWB-5221) prior to plant start-up after each refueling outage.

SCHEDULE FOR IMPLEMENTATION

November 1, 1985

-start of second inspection interval-