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 AUTH. NAME AUTHOR AFFILIATION
 MINECK, D.L. Illinois Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411 R

SUBJECT: Informs of status of Reg Guide 1.97 program activities & issues re accident monitoring instrumentation program. I

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Iowa Electric Light and Power Company

September 5, 1991
NG-91-2155

Dr. Thomas E. Murley, Director
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
Status of RG 1.97 Activities at the DAEC
Reference: D. Mineck (IELP) letter to T. Murley (NRC),
dated April 12, 1991 (NG-91-0640)
File: A-106

Dear Dr. Murley:

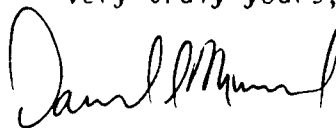
In the referenced letter, we advised the Staff of the status of our Accident Monitoring Instrumentation Program developed to implement Regulatory Guide (RG) 1.97. We identified six activities which we believed had to be complete prior to an NRC Inspection of our RG 1.97 program. The purpose of this letter is to inform the Staff of the present status of these activities and other issues regarding our Accident Monitoring Instrumentation Program.

The six activities described in the referenced letter, including issuance of a controlled list of RG 1.97 components, were completed on or before the scheduled date. Further details on each of the six activities are provided in the Attachment to this letter.

As discussed in the referenced letter, our consultant's review of our RG 1.97 program identified issues other than the six described in the Attachment which require further examination by Iowa Electric. Any changes to commitments or equipment modifications which may be necessary as a result of this examination will be promptly communicated to you.

If you have any further questions, please contact this office.

Very truly yours,



Daniel L. Mineck,
Manager, Nuclear Division

DLM/pmb

Attachment: Status of RG 1.97 Activities

cc: P. Bessette
R. McGaughy
L. Root
L. Liu
C. Shiraki (NRC-NRR)
A. Bert Davis (Region-III)
NRC Resident Office

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STATUS OF RG 1.97 ACTIVITIES

1. Master Equipment List

The Master Equipment List (MEL) for components subject to RG 1.97 was issued on May 8, 1991. The MEL is currently being controlled as an engineering database. The MEL and other documents applicable to the RG 1.97 program are being incorporated into the Iowa Electric Document Control System. Incorporating the MEL into the Document Control System will ensure that future changes to the MEL can be processed in accordance with the appropriate revision control procedures.

2. Control Room Identification

Guidelines were developed to determine which instruments are identified as RG 1.97 components. The guidelines are consistent with our operating philosophy and Emergency Operating Procedures in that operators are encouraged to use all available instrumentation to mitigate an accident and to be aware of plant conditions which can cause instrument readings to be unreliable. For those components requiring identification, a "RG 1.97" designator was engraved in the lower left-hand corner of the instrument labels. The labels are designed to help the operator easily identify the best qualified instruments for cases in which a choice is available. The guidelines and the basis for each are as follows:

- If a category 1 or 2 variable has multiple indications in the Control Room, and not all of these indications are qualified in accordance with the provisions of RG 1.97, the qualified instruments will be identified with the "RG 1.97" notation on the instrument label.

Basis

Control Room operators are expected to recognize that instruments identified as "RG 1.97" have additional qualifications that make them more reliable under accident conditions.

- If a category 1 or 2 variable has only one indication in the Control Room, and it is qualified in accordance with the provisions of RG 1.97, the instrument will not be specifically identified as a RG 1.97 component.

Basis

Specific identification of these instruments as "RG 1.97" is not required in that Control Room operators will use the only available indication for this variable.

- If a category 1 or 2 variable has multiple indications in the Control Room including meters and recorders, and each of these indications is qualified in accordance with the provisions of RG 1.97, the instruments will not be specifically identified as RG 1.97 components.

Basis

Control Room operators can use any instrument for that variable; all of the indications meet the additional qualification criteria of RG 1.97 and are equally reliable.

The labeling of specific accident monitoring instrumentation in accordance with the above guidelines in both the Control Room and Simulator has been completed.

While the above guidelines are consistent with our operating philosophy and meet the intent of RG 1.97, we understand that the labeling scheme is unconventional and we have subsequently decided to label all category 1 and 2 (Types A, B, and C) variables in the Control Room. The installation of these additional labels will be complete by December 31, 1991.

3. Control Room Operator Training

Initial training of Control Room personnel on the requirements of RG 1.97 accident monitoring instrumentation has been completed. The training emphasized the historical requirements for accident monitoring instrumentation, the purpose and content of RG 1.97, and guidelines for using RG 1.97 instrumentation during accident conditions. Training on RG 1.97 will be incorporated into the ongoing requalification training program for Control Room operators.

4. Equipment Data Base

The DAEC computerized equipment data base has been updated to ensure that it contains all the components listed in the MEL. A "RG 1.97" designator, including variable type and category, was added to the database for each component. These designators will help assure that the plant staff is aware of the unique requirements applicable to these components. Additionally, the quality level review field for RG 1.97 components in the equipment data base was erased. This means that new quality assurance requirements, consistent with the provisions of RG 1.97, must be assigned before any maintenance or modifications can be performed on these components. Guidelines have been provided which detail the quality provisions applicable to each RG 1.97 component category.

5. Physical Independence of Electrical Systems - RG 1.75

A position paper detailing Iowa Electric's compliance with the separation and isolation provisions of RG 1.97 and RG 1.75, "Physical Independence of Electrical Systems", has been completed. The paper delineates how the current DAEC design compares with the criteria of RG 1.75 and provides recommendations for exceptions to selected criteria.

6. Seismic Qualification - RG 1.100

A position paper detailing Iowa Electric's compliance with seismic qualification provisions of RG 1.97 and RG 1.100, "Seismic Qualification of Electric Equipment for Nuclear Power Plants", has been completed. The paper correlates DAEC original construction and subsequent seismic qualification design practices to the provisions of RG 1.100 and provides recommendations for exceptions to selected criteria. Additionally, the paper outlines the actions necessary to evaluate and resolve the seismic issues identified earlier in our review of our accident monitoring instrumentation program. Any equipment modifications which may be necessary as a result of this review will be promptly communicated to you.

* Documentation of these exceptions is available onsite for Staff review.