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## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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) R

SUBJECT: Discusses util response to NRC 911003 ltr containing NRC position on operability of safety-related dual-function valves. Util will adopt more conservative position & enter LCO action statements if ECCS experiences failure mode. I D

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*M/A*

Iowa Electric Light and Power Company

December 11, 1991

NG-91-3909

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
M/S P1-137  
Washington, D.C. 20555

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op License No: DPR-49  
"Response to NRC Position on Operability of  
Safety-Related Dual Function Valves"  
Reference: Letter Dated October 3, 1991 from C. Shiraki,  
Senior Project Manager to L. Liu, Iowa  
Electric Light and Power "NRC Position on  
Operability of Safety-Related Dual Function  
Valves" (TAC No. 80647)  
File: A-117

Dear Dr. Murley:

Iowa Electric Light and Power Company (IELP) staff met with the NRC staff on August 16, 1991, and presented its position that valves such as the Emergency Core Cooling System (ECCS) Torus Suction Valves are not containment isolation valves and that the Technical Specifications (TS) closure action statement does not apply to these valves. IELP concluded that because closure of these valves defeats the ECCS, application of the TS action statement would be contrary to safety.

On October 3, 1991, the above-referenced letter was issued stating the NRC staff's position on safety-related dual function valves, i.e., "if any ECCS/Containment Isolation Valve experiences a failure mode that does not allow the valve to fully function as intended, the requirements for primary containment isolation may no longer be met, and, unless relief is granted, the Limiting Condition of Operation (LCO) for primary containment isolation applies." It is the position of the NRC that valves such as the ECCS Torus Suction Valve are Primary Containment Isolation Valves (PCIVs).

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Dr. Thomas E. Murley  
NG-91-3909  
December 11, 1991  
Page 2

We have researched the documentation for the valves in question. Although they have never been listed in the table of Primary Containment Isolation Valves contained in the TS, we can find no documentary explanation for that exclusion. We will therefore adopt the more conservative position and enter the LCO action statements for primary containment isolation if an ECCS/Containment Isolation Valve experiences a failure mode which inhibits the valve from performing its containment isolation function. However, it is our understanding that the referenced letter addressed only TS action statements for dual-function valves and was not intended to modify or supercede any exemptions, reliefs or exceptions to other regulatory requirements, such as, Appendix J, Environmental Qualification, Inservice Testing, etc., nor was it intended to modify our present application of these programs. Please advise us promptly if this is not your understanding.

Very truly yours,



Daniel L. Mineck  
Manager, Nuclear Division

DLM/GTK:so  
cc: G. Kaegi  
L. Liu  
L. Root  
R. McGaughy  
C. Shiraki (NRC-NRR)  
A. Bert Davis (Region III)  
NRC Resident Office