

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9112190002 DOC. DATE: 91/12/11 NOTARIZED: NO DOCKET #
 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

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2 S
 TITLE: OR Submittal: General Distribution /

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES		
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL	
	PD3-3 LA		1	1		PD3-3 PD		1	1	
	SHIRAKI, C.		2	2						
INTERNAL:	ACRS		6	6		NRR/DET/ECMB 7D		1	1	
	NRR/DET/ESGB		1	1		NRR/DOEA/OTSB11		1	1	
	NRR/DST 8E2		1	1		NRR/DST/SELB 7E		1	1	
	NRR/DST/SICB8H7		1	1		NRR/DST/SRXB 8E		1	1	
	NUDOCS-ABSTRACT		1	1		OC/LFMB		1	0	
	OGC/HDS2		1	0		<u>REG-FILE</u> 01		1	1	
	RES/DSIR/EIB		1	1						
EXTERNAL:	NRC PDR		1	1		NSIC		1	1	

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 22 0

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 ~~N~~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).

9112190002 911211
PDR ADOCK 05000331
P PDR

A001
110

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