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 MINECK, D.L. Iowa Electric Light & Power Co.
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 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411) R

SUBJECT: Forwards description & schedules re accident monitoring I
 instrumentation program developed to address Reg Guide 1.97. D
 Primary containment valve list will be completed by 920215. S

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Iowa Electric Light and Power Company

January 8, 1992
NG-92-0084

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
Op. License No: DPR-49
Status of RG 1.97 Activities at DAEC
Reference: 1) Letter from D. Mineck (IELP) to
T. Murley (NRC), dated April 12, 1991
(NG-91-0640)
2) Letter from D. Mineck (IELP) to
T. Murley (NRC), dated September 5,
1991 (NG-91-2155)
File: A-106

Dear Dr. Murley:

In Reference 1, we advised the Staff of the status of our Accident Monitoring Instrumentation Program developed to implement Regulatory Guide 1.97. Reference 1 also identified six activities which we believed had to be complete prior to an NRC inspection of our RG 1.97 program. In Reference 2, we informed the staff of the completion of those activities. As discussed in the referenced letters, our review of our RG 1.97 program identified issues other than the six described in References 1 and 2 which required further evaluation by Iowa Electric. The purpose of this letter is to inform the staff of those activities remaining to be completed.

The Attachment to this letter provides a description of each of the activities which require further evaluation and a schedule for their completion. Any significant enhancements or equipment modifications which may result from these evaluations will be scheduled and communicated to the Staff via Semi-Annual Updates to our Integrated Plan.

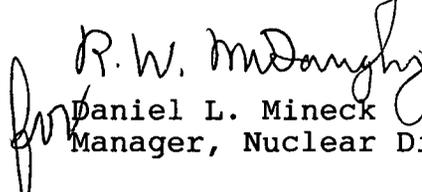
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Dr. Thomas E. Murley
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If you have any further questions, please contact this office.

Very truly yours,


Daniel L. Mineck
Manager, Nuclear Division

DLM/PMB/pjv~

Attachment: Remaining RG 1.97 Activity Descriptions and Schedules

cc: P. Bessette
L. Liu
L. Root
J. Franz
C. Shiraki (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
Commitment Control #A91154

RG 1.97 ACTIVITY DESCRIPTIONS AND SCHEDULES

- REFERENCES:
- 1) Letter, D. Mineck (IELP) to T. Murley (NRC) dated Sept. 20, 1991 (NG-91-2762)
 - 2) Letter, D. Mineck (IELP) to T. Murley (NRC) dated October 28, 1991 (NG-91-3151)
 - 3) Letter, R. McGaughy (IELP) to H. Denton (NRC) dated July 3, 1985 (NG-85-2423)
 - 4) Letter, D. Mineck (IELP) to T. Murley (NRC) dated September 5, 1991 (NG-91-2155)
 - 5) Letter, D. Mineck (IELP) to T. Murley (NRC) dated May 3, 1989 (NG-89-0057)

1. Primary Containment Isolation Valve List

On September 20, 1991, Iowa Electric submitted a request for an Amendment to our Facility Operating License (Reference 1). The proposed change will remove the component lists from Section 3.7 of the DAEC Technical Specifications within the guidelines set forth in NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications." As part of the TS amendment and implementation process, we are reviewing which valves will be subject to the revised administrative controls for containment isolation valves. Upon completion of this activity, the RG 1.97 containment isolation valve position indication list will be revised accordingly.

Completion Date: 2/15/92

2. Status of Standby Power

RG 1.97 requires the status of standby power and other energy sources important to safety (Type D, Category 2 variable) be available to control room operators during accident conditions. Our RG 1.97 instruments for this variable are located in the essential switchgear rooms along with the associated equipment. The essential switchgear rooms are included in the Control Room/Control Building envelope such that access to the indications is available to operators during normal and post-accident conditions. Control Room indications consist of annunciators and alarms which are not included in our RG 1.97 program. As described in our response to NRC Generic Letter 91-06, "Resolution of Generic Issue A-30" (Reference 2), an evaluation is being performed to determine if the current RG 1.97 instrumentation for this variable is adequate to support control room operators during an accident. Additionally, the evaluation will consider the addition of the control room annunciators for this variable to the RG 1.97 program.

Completion Date: 4/1/92

3. Single Point Failure Criteria for Reactor Pressure Instrument

Section 1.3.1.b to RG 1.97 states that no single failure within either the accident monitoring instrumentation or its power sources concurrent with the failures that are a condition or result of a

specific accident should prevent the operators from being presented the necessary information. Our review of the RG 1.97 program identified a potential scenario wherein an instrument line failure within primary containment (as a result of a high energy line break) coincident with the loss of a single instrument power supply could result in the loss of reactor pressure instrumentation in the control room. An engineering evaluation is being performed to determine if the proposed scenario is credible and recommend any necessary corrective actions.

Completion Date: 4/1/92

4. Availability of Instrumentation in Emergency Response Facilities

Items 8.2, "Technical Support Center (TSC)" and 8.4 "Emergency Operations Facility (EOF)" of Generic Letter 82-33, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability" state that variables which are essential for performance of TSC or EOF functions should be available in each of the facilities. Our response to Generic Letter 82-33 (Reference 3) stated that types B, C, D, and E variables (the DAEC has no type A variables) necessary for TSC and EOF functions are provided in each facility. Our review of the RG 1.97 program noted that certain accident monitoring instruments are not indicated in the EOF or TSC. An engineering evaluation will be performed to determine if the instrumentation currently available in these facilities is sufficient.

Completion Date: 6/1/92

5. Provisions for Class 1E Power for Category 1 Instruments

Sections 1.3.1.c to RG 1.97 states that Category 1 instrumentation should be energized from station standby power sources and should be backed up by batteries where momentary interruption is not tolerable. We have identified certain primary containment isolation valve position indications (Type B, Category 1 variables) that are supplied by interruptible Reactor Protection System motor-generator sets. An engineering evaluation will be performed to determine the acceptability of these power supplies. This evaluation will incorporate the results to the activities described in Item 1 of this Attachment.

Completion Date: 6/15/92

6. Physical Independence of Electrical Systems - RG 1.75

In Reference 4, we informed the Staff that a position paper detailing Iowa Electric's compliance with the separation and isolation provisions of RG 1.97 and RG 1.75 was completed. The paper delineates how the current DAEC design (which pre-dates RG 1.75) compares with

the criteria of RG 1.75 and provides recommendations for exceptions to selected criteria. The results of this review and our exceptions to certain criteria of RG 1.75 will be provided to the Staff as part of the Licensing submittal discussed in Item 8 of this Attachment.

7. Seismic Qualification - RG 1.100

In Reference 4, we informed the Staff that 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", was completed. The paper correlates DAEC original design and construction (which pre-date RG 1.100) 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 other seismic issues identified earlier in our review of our accident monitoring instrumentation program. The results of this review and plans for resolution of seismic issues will be provided to the Staff as part of the Licensing submittal discussed in Item 8 of this Attachment.

8. Revisions to Instrument Categories

In Reference 3, we provided the staff with a preliminary description of our plans to meet the requirements of RG 1.97. Included in that submittal was a table which detailed our implementation of each RG 1.97 variable including applicable categories, instrument ranges, etc. Commitments to certain variables were subsequently amended in Reference 5. During our review of the RG 1.97 program, we determined that the qualification categories for certain variables require revision. A description of these revisions and an update to the variable table originally submitted as part of Reference 3 will be forwarded to the staff by June 30, 1992. As part of this effort, we will also review the basis for our decisions regarding Category A variables and inform the staff of the results of that review.