

March 11, 1992

Docket No. 50-331

Mr. Lee Liu
Chairman of the Board and
Chief Executive Officer
Iowa Electric Light and Power Company
Post Office Box 351
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Dear Mr. Liu:

SUBJECT: DUANE ARNOLD ENERGY CENTER - SECOND 10-YEAR INSERVICE
TESTING (IST) PROGRAM, REVISION 9 (TAC NO. M76095)

By letter dated January 5, 1990, Iowa Electric Light and Power Company submitted Revision 9 of the Duane Arnold Energy Center IST Program. Revision 9 incorporated NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." Additional changes submitted by letters dated October 15, 1990, December 31, 1990, and August 30, 1991 are included in this review.

The Code of Federal Regulations, paragraph 10 CFR 50.55a(g), requires certain ASME Code Class 1, 2, and 3 pumps and valves in light-water-cooled nuclear power facilities to meet the IST requirements stated in the ASME Boiler and Pressure Vessel Code, Section XI; specifically, subsection IWP, Inservice Testing of Pumps in Nuclear Power Plants, and Subsection IWV, Inservice Testing of Valves in Nuclear Power Plants. Each facility is required to establish a program for the IST of pumps and valves which is updated every 10 years to meet the requirements in the latest approved edition and addenda to Section XI of the ASME Code. The program is submitted to the NRC for review and approval of the relief requests. The review entails verifying that the program is based on the applicable Code edition and addenda, and verifying the acceptability of the requests for relief from the requirements of Subsections IWP and IWV.

The enclosed Safety Evaluation (SE) incorporates the Technical Evaluation Report (TER) which was prepared by EG&G, Idaho. The staff is granting relief from the testing requirements which we have determined would be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, or where the proposed alternate testing provides an acceptable level of quality and safety. We have indicated relief requests which were approved by GL 89-04 and did not require evaluation.

The "Anomalies" section in the TER identifies items the licensee should address within the schedule requested in the specific anomaly. For relief requests that have been denied, the licensee's testing should comply with the Code requirements or GL 89-04 within the first quarter after receiving this SE.

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increase in safety, or where the proposed alternate testing provides an acceptable level of quality and safety. We have indicated relief requests which were approved by GL 89-04 and did not require evaluation.

Appendix A of the TER identifies items the licensee should address and respond to by the schedule requested in each item. For those Appendix A items not having a specific schedule, the licensee's response is due within one year of the date of this SE, or by the end of the next refueling outage, whichever is later. For relief requests that have been denied, the licensee's testing should comply with the Code requirements or GL 89-04 within the first quarter after receiving this SE.

The licensee is required to comply with the IST program defined in the above referenced letters where relief has been granted in the enclosed SE. Program changes such as additional relief requests or changes to relief requests should be submitted for staff review but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in Generic Letter 89-04, Enclosure 1, should be submitted to the NRC staff but can be implemented provided the guidance in Generic Letter 89-04, Section D, is followed. Program changes that involve additions or deletions of components from the IST program should be provided to the NRC.

The review performed for the SE did not include verification that all pumps and valves within the scope of 10 CFR 50.55a and Section XI are contained in the IST program. Additionally, for the components included in the IST program, no determination was made to ensure all applicable testing requirements were identified. Therefore, the licensee is requested to provide the NRC with a description of the process used in developing the IST program. The submittal should include, as a minimum, details of the documents used, the method of determining if a component requires inservice testing, the basis for the testing required, the basis for categorizing valves, and the method or process used for maintaining the program current with design modification or other activities performed under 10 CFR 50.59. If a description of this process is not already available from existing documentation, the staff envisions that this request could be answered in two to four pages. It could be incorporated into the IST program in appropriate sections. We request this information be submitted within one year of the date of this SE, or by the end of the next refueling outage, whichever is later.

Based on the review of the licensee's IST program relief requests, submitted by letter dated January 5, 1990, and supplemented October 15 and December 31, 1990, and August 30, 1991, the staff concludes that the relief requests as evaluated and modified by this SE will provide reasonable assurance of the

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operational readiness of the pumps and valves to perform their safety-related functions. The staff has determined that granting relief, pursuant to 10 CFR 50.55a(a)(3)(i), (a)(3)(ii) and (g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest.

Sincerely,

Leonard Olshan/for
John N. Hannon, Director
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

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*LA; PDIII-3
PKreutzer
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*PE: PDIII-3
JLombardo:sw
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CShiraki
2/13/92

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JHannon
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as revised on clipped pages

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