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RECIP. NAME RECIPIENT AFFILIATION
MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Responds to concerns re DAEC containment isolation valves resulting from addl info submitted in response to GL 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance."

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Iowa Electric Light and Power Company

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JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

July 2, 1992
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Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to Concerns Regarding DAEC Containment
Isolation Valves
Reference: Letter, Shiraki (NRC) to L. Liu (IELP) dated March
6, 1992
File: A-101b

Dear Dr. Murley:

On December 10, 1990 and March 11, 1991, Iowa Electric Light and Power Company (IELP) submitted our response to Supplement 3 to Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," for the Duane Arnold Energy Center (DAEC). On August 21, 1991, we submitted additional information as requested by your staff. In the above referenced letter, your staff expressed some concern regarding the capability of specific containment isolation valves to perform their design basis function. IELP has subsequently discussed these concerns with two members of your staff. This letter documents the results of that communication.

The primary concern with the valves in question was the inaccuracies associated with MOVATS test equipment. As discussed with your staff, this concern does not apply to the DAEC. The MOVATS system was replaced by the Valve Operation Test and Evaluation System (VOTES) prior to the date of our response to GL 89-10, Supplement 3. The MOV test data included in our submittal of March 11, 1992 was generated using VOTES equipment. Accuracy limitations associated with VOTES equipment were accounted for in the calculations for minimum thrust.

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We also discussed your staff's concern regarding the action which would be taken in any instance when the actual stem factor, as determined through testing, exceeds the predicted stem factor used to calculate the minimum thrust requirements for a given valve. Should this occur, the results of our valve testing will be evaluated to ensure that sufficient margin exists to account for the actual stem factor. If insufficient margins exists, the valve would be declared inoperable and the appropriate corrective actions taken. Thus, stem factor presents an operability concern as well as a maintenance concern.

We wish to confirm that adequate operating margins exist for the four valves of concern, as listed in the referenced letter. These valves are fully capable of performing their design basis function to isolate containment in the event of a pipe break downstream of the valves. Accordingly, this letter satisfies the NRC's request that we develop a plan and schedule to address the valves of concern.

Should any questions arise, please contact this office.

Very truly yours,


John F. Franz, Jr.
Vice President, Nuclear

JFF/LRH:so

cc: L. Heckert
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