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July 11, 1980

In reply, please
refer to LAC-7024

DOCKET NO. 50-409

Mr. James G. Keppler
Regional Director
U. S. Nuclear Regulatory Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

SUBJECT: DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR (LACBWR)
PROVISIONAL OPERATING LICENSE NO. DPR-45
IE BULLETIN 80-10 - CONTAMINATION OF NONRADIOACTIVE
SYSTEM AND RESULTING POTENTIAL FOR UNMONITORED,
UNCONTROLLED RELEASE OF RADIOACTIVITY TO ENVIRONMENT

REFERENCE: (1) NRC Letter, Keppler to Linder,
dated May 6, 1980.

Dear Mr. Keppler:

In response to IE Bulletin 80-10 contained in Reference (1)
which requires action by us with regard to our power reactor
facility with an operating license, we have determined the
following:

1. Review your facility design and operation to identify systems that are considered as nonradioactive (or described as nonradioactive in the FSAF), but could possibly become radioactive through interfaces with radioactive systems, i.e., a nonradioactive system that could become contaminated due to leakage, valving errors or other operating conditions in radioactive systems. In particular, special consideration should be given to the following systems: auxiliary boiler system, demineralized water system, isolation condenser system, PWR secondary water clean-up system, instrument air system, and the sanitary waste system.

DPC RESPONSE

The facility design and operation of systems considered as non-radioactive have been reviewed and the design and operating procedures found to be adequate. A detailed review of the systems requiring special consideration is provided in this response.

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1. Heating Boiler

The heating boiler provides steam to the "converter" to heat convector water for the Multizone, Control Room air conditioners and outer wall convectors. It also supplies steam to space heaters in the turbine plant. Connections to contaminated systems are protected by closed valves and/or blank flanges as indicated below:

- a. Gland Steam - Double valves and blank flange.
No condensate return exists.
- b. Recombiner Ejector - Valve, blank flange, and check valve.
Condensate return, two locked closed valves.
- c. Waste Water Evaporator - Unused.
- d. Containment Building, check valve on steam supply and automatic valve on condensate return.
- e. Decay Heat Cooler - Used only for prehydro heatup to > NDT.
During reactor operation, closed valve and blank in steam line and closed valves in condensate return.

2. Demineralized Water System

The demineralized water system is used only within the plant, and receives its supply from a gravity tank to pumps which maintain approximately 80 psi pressure on the system. Portions of the system in the Containment Building, not required for safety related systems, are protected from contamination by automatic-isolation and check valves. Safety related systems include check valves as well as the control valves.

3. Shutdown Condenser

The shutdown condenser is a shell and tube heat exchanger, with the tubes being utilized for primary steam. The shell side is supplied by demineralized water, described above, and the High Pressure Service Water (HPSW) System.

4. High Pressure Service Water (HPSW) System

The HPSW obtains its supply from the Mississippi River. Portions inside the Containment Building are protected the same as the Demineralized Water System.

5. Instrument Air

Instrument air used in the Containment Building is protected by check valves. The air compressors take a suction from the Turbine Building atmosphere.

6. Sanitary Waste System

No systems or components inside the plant utilize the sanitary waste system. Showers and sinks required for personnel decontamination drain to the waste water storage tanks. Toilets and sinks in the rest rooms and lunch room sink drain to the sanitary waste system.

7. Well Water

Well water has been removed from the Containment Building and the building penetration capped off.

2. *Establish a routine sampling/analysis or monitoring program for these systems in order to promptly identify any contaminating events which could lead to unmonitored, uncontrolled liquid or gaseous releases to the environment, including releases to on-site leaching fields or retention ponds.*

DPC RESPONSE:

A routine sampling program, as specified in a health and safety procedure, is in effect for LACBWR which would promptly identify any contaminating event of non-radioactive systems except for the following:

1. The heating boiler is not presently sampled for contamination, but is being added to the program.
2. The sanitary waste system is not sampled for contamination and will not be due to only receiving toilet and rest room sink waste from outside of the restricted area.
3. The instrument air system is not presently sampled for contamination as it obtains its air supply from the Turbine Building atmosphere which is sampled and continuously monitored.

Mr. James G. Keppler, Regional Director
U. S. Nuclear REGULATORY Commission

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Approval for this response to be submitted beyond the due date,
was granted by Mr. Ken Baker, until July 11th, to Mr. John Parkyn
and Ms. Lynne Goodman of the LACBWR staff.

If you have any questions regarding this response, please let us
know.

Very truly yours,

DAIRYLAND POWER COOPERATIVE

Frank Linder

Frank Linder, General Manager

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