

Iowa Electric Light and Power Company

July 20, 1993
NG-93-2657

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

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
Environmental Qualification Equipment
Inspections
Reference: Letter, McGaughy (IELP) to Eisenhut
(NRC), NG-83-3368, dated September 30,
1983
File: A-64, A-100

Dear Dr. Murley:

As part of Iowa Electric Light and Power's (IELP) ongoing review of the Duane Arnold Energy Center (DAEC) Environmental Qualification (EQ) program, we have determined that certain inspections are no longer necessary. This letter is written to inform you that we will no longer inspect the Hypalon paint on end caps of the primary containment electrical penetration assemblies each refuel outage.

Our EQ submittal (Reference) described this inspection as required to support 40-year qualification of the penetration assemblies. We have subsequently learned that qualification of the assembly is not dependent upon the Hypalon paint. The Hypalon paint was applied to cover the epoxy on the ends of the penetrations. The paint was intended to protect the epoxy and to enhance its performance as a moisture barrier. Since the DAEC penetration assemblies were installed, later versions of the same penetration assembly without the Hypalon paint were tested and no adverse effects were identified.

We have reviewed the results of these tests and the differences between the penetrations installed at the DAEC and later models. We have concluded that the results of qualification tests of later penetration models are also applicable to the penetrations at DAEC. As a result, we have concluded that, since the Hypalon paint does not contribute to qualification of the assembly, regular inspections are no longer necessary. We will continue to monitor the penetrations when they are opened for other purposes.

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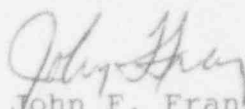
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Eliminating the Hypalon paint inspections will reduce radiation exposures of personnel. Access to the ends of the penetrations (which are inside primary containment) requires scaffolding. Erection of scaffolding for each penetration and the time spent opening and closing the penetrations requires that the workers spend a great deal of time inside the drywell, which results in significant radiation dose. In addition to the dose savings, eliminating this inspection means that we will not be opening the penetrations as often, thereby minimizing the risk of damage to the conductors inside.

We are eliminating the inspections of Hypalon paint on the basis that the paint is not required for environmental qualification of the primary containment electrical penetrations. We will thereby reduce personnel exposure and the potential for equipment damage. We have revised the EQ documentation maintained onsite to reflect this change. In addition, we will continue to review the DAEC EQ program and, if other changes require NRC notification, they will be discussed with your staff.

Should you have any questions regarding this matter, please contact this office.

Very truly yours,



John F. Franz
Vice President, Nuclear

JFF/SRC/pjv~

cc: S. Catron
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