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INDUSTRIES INC.

February 9, 1994
NG-94-0410

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
Reply To Unresolved Item Transmitted With
Inspection Report 93018, Service Water System
Operational Performance Inspection
File: A-102

Dear Dr. Murley:

This letter and its attachment are provided in response to the recent inspection of the Duane Arnold Energy Center's (DAEC's) Safety-Related Service Water System.

The attachment to this letter responds to the Unresolved Item transmitted with Inspection Report 93018, Service Water System Operational Performance Inspection.

This letter contains the following new commitment:

Complete the verification of the adequacy of the interface between the safety-related 24" Emergency Service Water/Residual Heat Removal Service Water return header and the non-safety-related 8" Well Water line by November 1, 1994.

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If you have any questions regarding this matter, please feel free to contact my office.

Very truly yours,

David Wilson for

John F. Franz
Vice President, Nuclear

Attachment: Reply To An Unresolved Item Transmitted With Inspection Report 93018

JFF/RJM:so
cc: R. Murrell
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
J. Martin (Region III)
NRC Resident Office
DCRC

IES UTILITIES INC.
REPLY TO AN UNRESOLVED ITEM
TRANSMITTED WITH INSPECTION REPORT 93018

During the recently performed Service Water System Operational Performance Inspection (SWSOPI), one unresolved item (331/93018-01) was identified regarding a Well Water line in the High Pressure Coolant Injection (HPCI) pump room that was not reviewed under the original "Seismic Analyses for As-Built Safety-Related Piping Systems" (IEB 79-14) program. The NRC Staff requested that the DAEC Staff submit a written response detailing the steps that will be taken to address this issue and the date when the analyses will be completed. The following is a summary of the issue, actions taken, the steps that will be taken, and the date when all actions will be completed.

SUMMARY OF THE ISSUE

During the SWSOPI Inspection, the interface between the seismic and non-seismic portions of the Emergency Service Water (ESW)/Residual Heat Removal Service Water (RHRSW) and Well Water return lines in the HPCI pump room was reviewed by the NRC Inspection Team for adequate system isolation. During this review, the DAEC Staff discovered that the non-safety-related 8" Well Water line, which ties into the safety-related 24" ESW/RHRSW return header, had been excluded from the IEB 79-14 review program. During the inspection, the NRC inspectors concluded that, to properly address seismic adequacy, the 8" non-seismic Well Water line should have been included in the IEB 79-14 program scope.

ACTIONS TAKEN

During the inspection, the DAEC Staff demonstrated through a review of the existing 1974 piping analysis for the 8" Well Water line, a preliminary walkdown of the piping, and an analysis of the effect of the local 8" branch nozzle stresses on the 24" piping analysis under the IEB 79-14 program, that the 24" return header met its seismic operability criteria. The NRC Inspection Team concurred with this conclusion.

The Steps That Will Be Taken And Date When All Actions Will Be Completed:

Verification of the adequacy of the interface between the safety-related 24" ESW/RHRSW return header and the non-safety-related 8" Well Water line will be completed by accomplishing the following items:

1) Relevant piping drawings and associated change documents will be reviewed for as-built information for the 8" Well Water piping run.

2) If no recent as-built information is available, a walkdown will be performed for the applicable portion of the 8" piping to confirm its routing and support arrangement per applicable drawings.

3) Review existing piping analysis for the 8" Well Water line against the as-built information. Results of this review will be documented, and the calculation revised, if necessary, to show that the DAEC IEB 79-14 Program criteria are met.

4) Records of a representative sample of other seismic/non-seismic piping interfaces will be reviewed to verify that all IEB 79-14 program requirements were properly considered.

This entire workscope will be completed by November 1, 1994.