

Iowa Electric Light and Power Company

February 3, 1983
NG-83-418

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

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

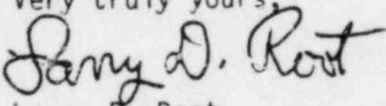
Re: Duane Arnold Energy Center
Subject: Update Response to Inspection Report 82-11
Item 1.B.c
Reference: IE Ltr NG-82-2348, Root to Keppler, "Response
to Inspection Report 82-11," dated November 8, 1982
File: A-102, NRC-4, Inspection Report 82-11

Dear Mr. Keppler:

This letter is to notify you of a change to our response to Inspection Report 82-11, concerning control of the diesel oil transfer system.

Page 2 of the reference response letter, Item 1.B.c, states that there is no safe means for controlling pump flow rate or discharge pressure for the Diesel Oil Transfer System. Also, it states that a relief request to allow alternate testing was drafted and undergoing internal review prior to being submitted to the NRC for approval. A copy of this relief request was attached to the response letter.

While in internal review, a safe method for controlling pump flow rate and discharge pressure was identified and the operability test for the diesel oil transfer pumps was modified to comply with this aspect of existing requirements. The relief request was changed accordingly. The revised relief request (as contained in our letter NG-82-2355, L. Root to H. Denton, dated December 8, 1982) is attached for your information.

Very truly yours,

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/DEW/pf*
Attachment: Relief Request No. PR-6

cc: D. Wittner
D. Arnold
L. Liu
S. Tuthill
NRC Resident Inspector
Commitment Control Ref: # 82-0351

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RELIEF REQUEST NO. PR-6

PUMP NUMBER: Diesel Oil Transfer Pumps 1P-44A and B

SECTION XI REQUIREMENTS:

- 1) During testing, the resistance of the system shall be varied until either the measured differential pressure or the measured flow rate equals the corresponding reference value.
- 2) Any deviations determined from the measured test quantities shall be compared with limits given in Table IWP-3100-2 and the specified corrective action taken.
- 3) Each pump shall be run at least five minutes under conditions as stable as the system permits.

BASIS FOR RELIEF:

- 1) There are no safe means for controlling diesel oil transfer pump flow rate or discharge pressure. The diesel oil transfer pump is a screw type, positive displacement, pump and the system has no over pressure protection.
- 2) The ASME limits in Table IWP-3100-2 are based on the assumption that an independent variable, either flow rate or differential pressure, is set to a specific reference value, and the dependent variable is measured and compared to the ASME limits. As stated above, neither flow rate nor differential pressure can be safely controlled. Therefore, the ASME limits in Table IWP-3100-2 cannot be applied to the diesel oil transfer pumps.