

Iowa Electric Light and Power Company

December 10, 1990
NG-90-2775

Dr. Thomas E. Murley
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to NRC Generic Letter 89-10,
Supplement 3, "Consideration of the Results
of NRC Sponsored Tests of Motor-Operated
Valves"
File: A-101b

Dear Dr. Murley:

In Supplement 3 to Generic Letter 89-10, BWR licensees were requested to assess the applicability of the data from the NRC sponsored motor-operated valve (MOV) tests, to determine the "as-is" capability of the six High Pressure Coolant Injection, Reactor Core Isolation Cooling, and Reactor Water Cleanup valves of concern and to identify any deficiencies in these MOVs. In addition, licensees were requested to perform a plant-specific safety assessment to verify that the generic safety assessments performed by the NRC staff and BWR Owners' Group are applicable to their facility.

We are participants in the BWR Owners' Group MOV committee, MOV Users Group and EPRI and have followed closely the developments and concerns associated with the NRC-sponsored testing. Consequently, we focused our MOV efforts for the Cycle 10/11 refuel outage on the six containment isolation valves of concern to ensure that they would operate under all design basis conditions.

Our evaluation of the valves' design and performance allows us to conclude that, even when considering the results of the NRC-sponsored testing, these valves will perform their safety function when subjected to design-basis differential pressure and flow conditions. However, we recognize that the NRC-sponsored testing has identified anomalous behaviour in the test valves and uncertainties in the current thrust prediction methodologies. Therefore, in accordance with the requested actions of Supplement 3, we have performed a plant-specific safety assessment that addresses the factors detailed in Supplement 3. Like the NRC and BWROG safety assessments, our safety assessment concludes that a significant safety concern does not exist, even if the isolation MOVs of concern may not have optimally sized or set actuators for full closure under postulated maximum design basis flow and differential pressure conditions. This safety assessment is on file and available for Staff review. We have not identified any MOVs with

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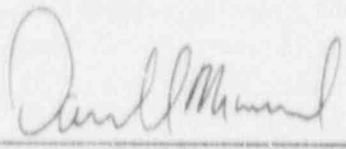
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deficiencies of greater safety significance than the six containment isolation valves of concern.

We will continue to monitor the progress and resolution of this issue through participation in BWR Owners' Group and other utility groups and will inform the staff of any changes to the above conclusions.

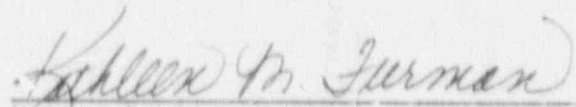
This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By 
DANIEL L. MINECK
Manager, Nuclear Division

State of Iowa
(County) of Linn

Signed and sworn to before me on this 10th day of December, 1990,
by Daniel L. Mineck


Notary Public in and for the State
of Iowa

September 28, 1992
Commission Expires

DLM/PMB/pjv+

cc: P. Bessette
L. Liu
L. Root
R. McGaughy
S. P. Sands (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
Commitment Control #900339