

## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 24, 1994

Docket No. 50-331

Mr. Lee Liu Chairman of the Board and Chief Executive Officer IES Utilities Inc. Post Office Box 351 Cedar Rapids, Iowa 52406

Dear Mr. Liu:

SUBJECT: DUANE ARNOLD ENERGY CENTER - TRANSMITTAL OF THE NRC SAFETY EVALUATION REPORT FOR THE BWR OWNERS' GROUP RESPONSE TO GENERIC LETTER 89-19, "REQUEST FOR ACTION RELATED TO RESOLUTION OF UNRESOLVED SAFETY ISSUE A-47 'SAFETY IMPLICATION OF CONTROL SYSTEMS IN LWR NUCLEAR POWER PLANTS' PURSUANT TO 10 CFR 50.54(f)." AND REQUEST FOR ADDITIONAL INFORMATION (TAC NO. M74939)

Enclosed is the NRC Staff Safety Evaluation Report (SER) which addresses the BWR Owners' Group (BWROG) response, dated April 2, 1990, to the above subject. Based on the staff's review of the response and the cost/safety benefit analysis, the staff has concluded that upgrading the existing automatic overfill protection systems to achieve additional separation is not warranted. Your letter, dated May 4, 1990, stated that you had reviewed the BWROG report and verified the generic aspects of the report are applicable to your facility.

Furthermore, the submittal provided your plant-specific response to the Generic Letter (GL) for your facility. A supplemental submittal, dated July 21, 1990, indicated that an existing Surveillance Test Procedure, will not be revised in accordance with your original commitment of May 4, 1990. Our review indicates that you do not have the appropriate Technical Specifications (TS) governing the availability of the overfill protection system instrumentation and you did not address training to cope with potential overfill events. The TS should reflect the plant as-built configuration and be similar to the GE-Standard Technical Specifications (STS) that were applicable at the time the staff issued GL 89-19. Guidance regarding the TS for BWR-4s is provided in the GE-STS BWR/4, under TS 3/4.3.9, "PLANT SYSTEMS ACTUATION INSTRUMENTATION." It should be noted that TS 3/4.3.9 can be modified for individual plant-specific designs and TS formats.

Please provide your response regarding overfill event training and your schedule for making Technical Specification changes or justify an alternative resolution within 30 days following your receipt of this letter. If you have any questions concerning this matter, please contact me at (301) 504-3016.

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The information requested by this letter is within the scope of the overall burden estimated in Generic Letter 89-19, which was a maximum of 240 person hours per licensee response. This request is covered by Office of Management and Budget Clearance Number 3150-0011, which expires May 31, 1994.

Sincerely,

Original signed by
Robert M. Pulsifer, Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Enclosure: Staff Safety Evaluation

cc w/enclosure: See next page

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Mr. Lee Liu IES Utilities Inc.

CC:

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