



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Docket No. 50-331

August 18, 1994

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 - GENERIC LETTER 89-19, "SAFETY
IMPLICATIONS OF CONTROL SYSTEMS IN LWR NUCLEAR POWER PLANTS"
(TAC M74939)

By letter dated May 24, 1994, the NRC staff transmitted a Safety Evaluation Report (SER) regarding Generic Letter 89-19 (GL), "Request for Action Related to Resolution of Unresolved Safety Issue A-47, 'Safety Implication of Control Systems in LWR Nuclear Power Plants,'" for the BWR Owners' Group response to GL 89-19. In the SER, the staff requested your response regarding overfill event training and your schedule for making Technical Specification (TS) changes or justifying an alternative resolution.

The NRC's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (58 FR 39132) established a specific set of objective criteria as guidance for determining which regulatory requirements and operating restrictions should be included in TS. Criteria 3 of the final policy statement would require that the reactor vessel overfill protection system instrumentation be included in the TS, if this instrumentation serves to protect any fuel safety limits. However, Duane Arnold Energy Center (DAEC) stated in its June 30, 1994, response that the reactor vessel overfill protection system is not credited for minimum critical power ratio (MCPR) protection.

You further state, that instrumentation associated with the feedwater trip on high level should not be added to the DAEC TS, because they do not serve to protect any safety limits. The main turbine trip and feedwater pump trip are for the protection of the main turbine, not for the protection of a plant safety limit, and has no nuclear safety-related function. Therefore, DAEC concluded that placing the reactor water level (Level 8) trip units in the TS with action statements for inoperability could result in placing the plant in a condition of reduced margin of safety, by causing unnecessary turbine trips.

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Mr. Lee Liu

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The June 30, 1994, response also stated that the DAEC plant reactor water level instrumentation which feeds the level 8 trip units are currently in the DAEC TS and are calibrated every six months, and the trip units themselves are functionally tested every refuel outage. You also state that operator training and requalification includes scenarios which require operator intervention to control reactor vessel water level and prevent overfilling the vessel using existing procedures.

The staff finds your response as acceptable and this letter closes TAC M74939.

Sincerely,

ORIGINAL SIGNED BY:

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

cc: See next page

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Mr. Lee Liu

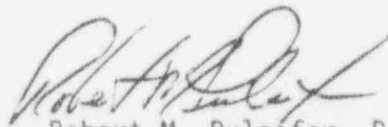
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August 18, 1994

The June 30, 1994, response also stated that the DAEC plant reactor water level instrumentation which feeds the level 8 trip units are currently in the DAEC TS, and are calibrated every six months, and the trip units themselves, are functionally tested every refuel outage. You also state, that operator training and requalification includes scenarios, which require operator intervention to control reactor vessel water level, and prevent overfilling the vessel using existing procedures.

The staff finds your response as acceptable, and this letter closes TAC M74939.

Sincerely,



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

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Mr. Lee Liu
IES Utilities Inc.

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