

January 3, 1995

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

SUBJECT: NRC POSITION ON OPERABILITY OF SAFETY RELATED DUAL FUNCTION VALVES  
AT THE DUANE ARNOLD ENERGY CENTER (TAC NO. 88398)

Dear Mr. Liu:

On October 3, 1991, the NRC issued a letter to IES Utilities, formerly known as Iowa Electric Light and Power Company, stating the staff's position on safety-related dual function valves. In a letter dated December 11, 1991, IES Utilities replied that, henceforth, if an Emergency Core Cooling System/Containment Isolation Valve experiences a failure mode which inhibits the valve from performing its containment isolation function, the limiting condition for operation action statements for primary containment isolation would be entered.

By letter dated December 7, 1993, IES Utilities withdrew its commitment to its position stated in the December 11, 1991, letter and identified the necessary documentation to justify the exclusion of the valves in question from the TS requirement for Primary Containment Power Operated Isolation Valves. The December 7, 1993, submittal discusses (a) why the valves were not subject to the requirements of the TS for Primary Containment Power Operated Isolation valves; and (b) why subjecting them to those requirements in accordance with the December 11, 1991, position would be less conservative than not subjecting them to the position.

The staff has reviewed the IES Utilities December 7, 1993, submittal and at this time, concurs with IES Utilities' position as stated in the submittal.

Sincerely,

Original signed by

Glenn B. Kelly, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

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\*See previous concurrence

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Mr. Lee Liu  
IES Utilities Inc.

Duane Arnold Energy Center

cc:

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