Iowa Electric Light and Power Company

October 1, 1984 NG-84-4277

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

Subject: Duane Arnold Energy Center

Docket No: 50-331 Op. License No: DPR-49 NRC IE Bulletin 79-14

Reference: NG-84-3544, August 31, 1984

File: A-101a

Dear Mr. Keppler:

This letter is submitted to provide the status and schedule for resolution of the work performed with regard to IE Bulletin 79-14.

Since our letter of August 31, 1984 (NG-84-3544), we have established a program which consists of three separate activities. These activities are: a re-walkdown of certain DAEC piping systems, a reassessment of the evaluations of discrepancies found during the original walkdown and a detailed review of all Bulletin 79-14 walkdown packages in order to identify any deficiencies. These activities are addressed more specifically below.

First, a re-walkdown of piping systems is in progress. Thus far, ten piping systems have been completed. A system is defined as a section of piping bounded by seismic anchors or equipment nozzles. Comparison of this walkdown data with that collected during the original Bulletin 79-14 task has revealed minor discrepancies in piping configuration, valve orientation, and support locations. These discrepancies have had no effect on the seismic adequacy of the systems. This re-walkdown is scheduled to be completed by October 31, 1984. This will allow us to include in the program a sample of computer analyzed small bore piping and other inaccessible piping systems during the present maintenance outage.

Second, in parallel with the re-walkdown, we are assessing the quality of the evaluations of discrepancies noted in the original walkdown packages. This reassessment has been completed for 15 piping systems. Our review has indicated the packages we have received from our contractor do not,

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at present, contain complete documentation for the stress analysts' resolution of discrepancies identified by the initial 79-14 walkdown.

Therefore, the third activity in the program provides that Bechtel performs a detailed review of all Bulletin 79-14 walkdown packages in order to identify any anomalies in documentation or resolution of discrepancies. December 31, 1984 has been established as the target date for completion of this effort. The goal of this work is to ensure that each walkdown package includes all of the required documentation and references needed to comply with Bulletin 79-14.

The discrepancies that we identified in the pipe support detail drawing verification, discussed in our August 31 letter, are being evaluated as they are found. Thus far, none of these discrepancies have had any effect on the seismic adequacy of the systems. However, we are continuing to reverify design conditions of the subject pipe supports as stated in our previous letter. This task will continue in parallel with the re-walkdown of the Bulletin 79-14 work, and in conjunction with our Ten Year In-Service Inspection.

All of the re-walkdown and reassessment results to date have been reviewed with regard to whether there is any deleterious impact on system operation and public safety. No adverse effect on operation or safety has been discovered, nor has our previous Bulletin 79-14 report been invalidated. Our present plan is to complete a final assessment of the original Bulletin 79-14 work by November 15, 1984.

As stated in our previous letter, if we find that safety margins are exceeded during postulated design basis conditions on any DAEC system, immediate action will be taken to declare the system inoperable and follow the action statements as required by the DAEC Technical Specifications.

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