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John F. Franz, Jr.  
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October 16, 1995  
NG-95-3089

Mr. William T. Russell, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Response to NRC Generic Letter 95-07, Pressure Locking and Thermal  
Binding of Safety-Related Power-Operated Gate Valves dated  
August 17, 1995

References: 1) Letter, J. Franz (IES Utilities, Inc.) to W. Russell (NRC) NG-95-0815  
dated March 10, 1995 regarding Removal of Certain Motor-Operated  
Valves from the DAEC Generic Letter 89-10 Program.  
2) Letter, from G. Grant (NRC) to L. Liu (IES Utilities, Inc.) dated  
September 14, 1995 regarding meeting with the NRC in November, 1995.

File: A-101b

Dear Mr. Russell:

The purpose of this letter is to provide the IES Utilities 60 day response to Generic Letter 95-07 regarding Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves (GL 95-07).

As requested in the Generic Letter, non-motor operated safety-related gate valves (air and hydraulic operated) will be evaluated consistent with the Generic Letter approach. Specifically, a screening evaluation will be performed by November 15, 1995. Valves that are determined to be potentially susceptible to thermal binding or pressure locking will then be evaluated for operability. Within 180 days of the date of issuance of GL 95-07 (by February 13, 1996), evaluations of the identified potentially susceptible valves will be completed and necessary corrective actions will be taken or scheduled as appropriate.

240086 Safety-related motor operated gate valves (hereafter SR-MOVs) were evaluated (in 1994) in response to Generic Letter 89-10, Supplement 6 for susceptibility to thermal

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binding and pressure locking. The SR-MOVs are a subset of those gate valves that are within the scope of the DAEC GL 89-10 program. This scope of valves included within GL 89-10 was determined utilizing the Generic Letter 89-10, Supplement 4 guidance on BWR mispositioning, and the DAEC position regarding reposition from test identified in Reference 1. The 1994 evaluation utilized a screening criteria for thermal binding susceptibility of greater than 200 degrees F differential temperature. This evaluation concluded that 10 valves were susceptible to pressure locking, of which 7 valves have been modified, and 3 are scheduled for modification during the next refueling outage (currently scheduled to commence in October, 1996). The remaining 3 valves will be evaluated further for operability and actions taken as appropriate within the recommended 90 days from GL 95-07 issuance. The previous evaluation identified eight additional valves as potentially susceptible to pressure locking but they are of very low safety significance from the probabilistic safety perspective. For these reasons the valves are not scheduled for modification.

By Reference 2 the NRC transmitted an invitation to attend a meeting on this topic in Region III scheduled on November 7, 1995. Information from that meeting will be evaluated and may result in revisions to our schedule or scope of activities related to pressure locking and thermal binding and will be factored into our 180 day response to GL 95-07.

In summary, this letter contains the following IES Utilities commitments related to power operated safety-related gate valves susceptible to pressure locking and thermal binding:

- 1) Evaluate and initiate action (comprised of corrective actions and/or further evaluations) for air and hydraulic power operated safety-related gate valves in accordance with GL 95-07 methodology and schedule.
- 2) Complete evaluations of SR-MOVs for operability and modify three remaining safety-related gate valves during the next refueling outage.
- 3) Provide the information requested by the NRC in GL 95-07 within 180 days of issuance of the Generic Letter, by February 13, 1996.

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

IES UTILITIES INC.

By *John F. Franz*  
John F. Franz  
Vice President, Nuclear

State of Iowa  
(County) of Linn

Signed and sworn to before me on this 16 day of October, 1995,

by *Rita M. Fry*.



*Rita M. Fry*  
Notary Public in and for the State of Iowa

6-29-98  
Commission Expires

JFF/WJM/mbm

cc: W. Miller  
L. Liu  
L. Root  
B. Fisher  
G. Kelly (NRC-NRR)  
H. Miller (Region III)  
NRC Resident Office  
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