



Duane Arnold Energy Center
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NG-97-2069
December 19, 1997

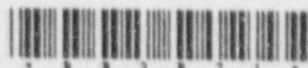
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Relief Request MC-R001
Reference: ASME Code, 1992 Edition with 1992
Addenda, Section XI, Subsection IWE
File: A-100, A-286

By Federal Register Notice dated August 8, 1996 (61 Federal Register 41303), the NRC amended 10CFR50.55a to incorporate by reference the 1992 Edition with 1992 Addenda of Subsections IWE and IWL of Section XI of the ASME Boiler and Pressure Vessel Code. Subsections IWE and IWL give the requirements for inservice inspection (ISI) of Class MC (metallic containments) and Class CC (concrete containments). 10CFR 50.55a references the 1989 Edition of ASME Section XI for the other Subsections.

Subarticle IWA-2300 of the 1992 Edition with 1992 Addenda requires non-destructive examination (NDE) personnel to be qualified and certified using a written practice in accordance with CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel. Subarticle IWA-2300 of the 1989 Edition requires a written practice based on SNT-TC-1A. The Duane Arnold Energy Center (DAEC) currently has a written practice based on SNT-TC-1A. Development and administration of a second program (based on CP-189) would not enhance safety or quality and would be an undue burden, as discussed in the attached relief request.

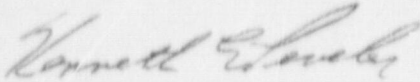
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10CFR50.55a permits the Director of the Office of Nuclear Reactor Regulation to grant relief to licensees who submit a justifiable need to use an alternative that provides an acceptable level of safety or who encounter extreme hardship or unusual difficulty without a compensating increase in the level of quality or safety. Pursuant to the provisions of 10CFR50.55a(a)(3)(ii), IES Utilities hereby requests approval of relief request MC-R001 prior to the upcoming refueling outage (RFO 15) currently scheduled to start on April 2, 1998.

Should you have any questions regarding this matter, please contact this office.

Sincerely,



Kenneth E. Peveler
Manager, Regulatory Performance

Attachment

cc: C. Rushworth
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RELIEF REQUEST NUMBER: MC-R001

COMPONENT IDENTIFICATION

Code Class: MC
References: IWE-2000

Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
Item Number: All item numbers
Description: ASME Section XI Examination and Inspection Procedures
for IWE Components
Component Numbers: All components

CODE REQUIREMENT

10CFR50.55a(g)(4)(v) requires that Class MC (IWE) and CC (IWL) pressure retaining components and their integral attachments meet the applicable ASME Section XI examination and inspection requirements (1992 with the 1992 addenda). (Subsection IWL does not apply to the Duane Arnold Energy Center (DAEC)).

Relief is requested from the provisions of Subarticle IWA-2300, "Qualification of Nondestructive Examination Personnel." This requires NDE personnel to be qualified and certified using a written practice in accordance with CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel, as amended by the requirements of this Division.

BASIS FOR RELIEF

10CFR 50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. A written practice based on the requirements of CP-189, as amended by the requirements of the Subarticle IWA-2300, to implement Subsection IWE duplicates efforts already in place for all other subsections. 10CFR 50.55a references the 1989 Edition of ASME Section XI for all other subsections. Subarticle IWA-2300 of the 1989 Edition requires a written practice based on SNT-TC-1A, as amended by the requirements of Subarticle IWA-2300.

Further, Subarticle IWA-2300 of the 1992 Edition, 1992 Addenda, states, "Certifications based on SNT-TC-1A are valid until recertification is required." Visual examination is the primary nondestructive examination method required by Subsection IWE. Neither CP-189 nor SNT-TC-1A specifically includes visual examination; thus, the Code requires qualification and certification to comparable levels as defined in CP-189 or SNT-TC-1A, as applicable, and the Employer's written practice.

Development and administration of a second program would not enhance safety or quality and would serve as a burden, particularly in developing a second written practice, tracking of certifications, and duplication of paperwork. This duplication would also apply to NDE vendor programs. Updating to the 1992 Edition, 1992 Addenda, for Subsections IWB, IWC, etc., would require a similar request for relief.

Relief is requested in accordance with 10CFR 50.55a(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

ALTERNATIVE EXAMINATION(S):

Examinations required by Subsection IWE and IWL shall be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A to the current Section XI Code of record.

APPLICABLE TIME PERIOD

Relief is requested for the first ten year interval of the Containment Inspection Program for the DAEC.