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 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards Rev 5 to inservice testing program for pumps & valves. Response to SER dtd 830926 re pending relief requests also encl.

SEE REPTS.

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Iowa Electric Light and Power Company

January 12, 1984

NG-84-0011

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Revised Inservice Testing Program for Pumps
and Valves
Reference: NRC Safety Evaluation Report, D. Vassallo
(NRC) to L. Liu (IELP), September 26, 1983

Dear Mr. Denton:

By our letters dated March 1, 1978, as revised May 14, 1980 (Revision 2), November 11, 1980 (Revision 3), and December 8, 1982 (Revision 4), Iowa Electric Light and Power Company submitted a proposed inservice testing description and request for relief from testing requirements pursuant to 10 CFR 50.55a(g) for our Duane Arnold Energy Center (DAEC).

In the referenced Safety Evaluation Report (SER), the NRC staff determined there were cases in which the requested relief could not be granted, others where alternate testing may be necessary, and those where relief could be granted.

This submittal provides supplemental information pertinent to resolution of pending relief requests, addresses issues raised in the Staff's SER (Attachment 1), and proffers a total, albeit minor, revision to the DAEC Inservice Testing (IST) Program for Pumps and Valves (Attachment 2); therefore, no revision bars are found in the righthand margins of the Program pages. The changes noted in Attachment 2 result from NRC staff review of Revision 4 to the Program. Attachment 3 provides a detailed summary of the changes between Revision 4 and Revision 5. Attachment 4 discusses our continuous engineering evaluation of the Program and its implementation with respect to plant design, installed modifications, and operational considerations. The new IST Program became effective December 23, 1983.

In accordance with DAEC Technical Specification 4.6.G.2 and 10CFR50, Section 50.55a(g)(6)(i), we hereby request your timely review and approval of this Program. We are implementing Revision 5 with the belief that it represents improvements over the Commission-approved Revision 4 and that Revision 5 does not degrade the effectiveness of the IST Program.

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Mr. Harold Denton
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As discussed with our NRC Project Manager in a telephone conversation on December 22, 1983, we received an extension until January 13, 1984 to respond to the referenced SER. Should you have any questions regarding this submittal, please feel free to call me.

Very truly yours,



Richard W. McGaughey
Manager, Nuclear Division

RWM/MSG/dmb*

Attachments: 1) Iowa Electric summary level response to NRC Safety
Evaluation Report dated September 26, 1983
2) Revision 5 - Inservice Testing Program for Pumps and Valves
3) Detailed Summary of IST Program Changes
4) Status of Continuing Engineering Evaluation of the IST
Program

cc: M. Grim
L. Liu
S. Tuthill
M. Thadani (NRC)
T. Hovenagle (ICC)
W. Larson (Iowa Bureau of Boiler Inspection)
NRC Resident Office
Commitment Control No. 83-0224

In their Safety Evaluation Report (SER) dated September 26, 1983, the NRC staff dispositioned Iowa Electric Light and Power Company's requests for relief from certain requirements of Section XI of the ASME Boiler and Pressure Vessel Code and provided other comments regarding Revision 4 of the Duane Arnold Energy Center (DAEC) Inservice Testing (IST) Program. The following provides our response to the dispositions and the NRC's comments.

I. REQUESTED RELIEF GRANTED

NRC POSITION (from paragraph A of referenced SER)

Relief is granted as requested for the testing of pumps and valves listed below (see SER for listing).

Iowa Electric Response

Where it is stated in the SER that relief is not required, Revision 5 of the Inservice Testing (IST) Program for Pumps and Valves voids the affected relief requests.

II. DENIED RELIEF REQUESTS

A. Relief Request No. VR-2

NRC POSITION (from paragraph B of referenced SER)

The requested relief described in VR-2 is denied on the basis of insufficient justification.

Iowa Electric Response

This relief request is resubmitted based on additional information supplied on page 31 of Attachment 2. An additional relief request, VR-34 (see page 65 of Attachment 2), provides further support and clarification of this issue.

B. Relief Request No. VR-3

NRC POSITION (from paragraph B of referenced SER)

Relief Request VR-3 requests relief from establishing maximum leak rates for individual valves subject to 10 CFR 50, Appendix J, Type C leak rate testing. It is the Staff position that while Sections IWV-3421 through IWV-3425 of ASME Section XI are adequately met by Appendix J of 10 CFR 50 for containment isolation valves, IWV-3426 and IWV-3427 still apply.

Iowa Electric Response

Iowa Electric will implement the NRC position and revise the IST Program to provide for individual valve limits and corrective action

in accordance with the ASME Boiler and Pressure Vessel Code, Section XI, paragraphs IWV-3426 and IWV-3427. Implementation is planned during the next refueling outage. As relief is no longer requested, the IST Program has been revised to void this request (see page 32 of Attachment 2).

C. Relief Request No. VR-13

NRC POSITION (from paragraph B of referenced SER)

The requested relief described in VR-13 is denied on the basis of insufficient justification.

Iowa Electric Response

This relief request is resubmitted based on additional information supplied on pages 43 and 44 of Attachment 2.

D. Relief Request No. VR-29

NRC POSITION (from paragraph B of referenced SER)

Relief Request V-29 requests relief from establishing maximum leak rates for individual valves subject to 10 CFR 50, Appendix J, Type C leak rate testing. It is the Staff's position that, while Section IWV-3421 through IWV-3425 of ASME Section XI are adequately met by Appendix J of 10 CFR 50 for containment isolation valves, Sections IWV-3426 and IWV-3427 still apply.

Iowa Electric Response

See response to III.F.

III. PUMPS AND VALVES REQUIRING ALTERNATE TESTING

A. Relief Request No. PR-2

NRC POSITION (from paragraph C of referenced SER)

Permanent relief is not granted pending the submittal of supplemental information. The licensee is required to investigate the usefulness of measuring oil temperature vice bearing temperature to determine the condition of emergency service water pump bearings.

Temporary relief is granted until the Staff has reviewed and evaluated the licensee's full response to this item.

Iowa Electric Response

Supplemental information pertinent to the resolution of Relief Request PR-2 is provided on page 12 of Attachment 2. Action on this request for relief will be deferred pending Staff review and disposition.

B. Relief Request No. PR-3

NRC POSITION (from paragraph C of referenced SER)

Permanent relief is not granted pending the submittal of supplemental information. The licensee is required to investigate the installation of permanent, remote reading instrumentation to measure vibration and bearing temperature of the High Pressure Coolant Injection (HPCI) booster and main pumps 1P-216, and Reactor Core Isolation Cooling (RCIC) pump 1P-226.

Temporary relief is granted until the Staff has reviewed and evaluated the licensee's response to this item.

Iowa Electric Response

Efforts are underway to install the required instrumentation to comply with ASME Section XI, paragraph IWP-3100. Pending the availability of necessary materials, completion is slated for 1985 (see page 13 of Attachment 2).

C. Relief Request No. PR-7

NRC POSITION (from paragraph C of referenced SER)

Instrument accuracy shall be within the limits of ASME Boiler and Pressure Vessel Code, Section XI, Table IWP-4110-1 for diesel oil transfer pumps 1P-44A and B, river water pumps 1P-117A, B, C and D, HPCI pumps 1P-216, and RCIC pump 1P-226.

Iowa Electric Response

This item is under evaluation and will be addressed in a subsequent submittal, if necessary, by March 26, 1984 (see page 18 of Attachment 2).

D. Relief Request No. VR-8

NRC POSITION (from paragraph C of referenced SER)

The licensee should provide definitive leak rate acceptance criteria for excess flow check valves by March 26, 1984.

Iowa Electric Response

Discussion pertinent to the resolution of Relief Request VR-8 is presented on page 38 of Attachment 2. No other action is contemplated at this time.

E. Relief Request No. VR-11

NRC POSITION (from paragraph C of referenced SER)

The licensee should investigate methods for determining individual valve performance for containment vacuum breaker valves (CV) 4327A through 4327H, (excluding E).

Iowa Electric Response

This item is under evaluation and will be addressed in a subsequent submittal, if necessary, by March 26, 1984. Discussion pertinent to the resolution of Relief Request VR-11 is presented on page 41 of Attachment 2.

F. Relief Request No. VR-29

NRC POSITION (from paragraph C of referenced SER)

The licensee should provide technical data to support leak testing in direction opposite to one in which containment isolation is performed.

Iowa Electric Response

This item is under evaluation and will be addressed in a subsequent submittal, if necessary, by March 26, 1984. Discussion pertinent to the resolution of Relief Request VR-29 is presented on page 60 of Attachment 2.

IV. VALVES REQUIRING PRESSURE ISOLATION VERIFICATION

NRC POSITION (from paragraph D of referenced SER)

The licensee is expected to select a method to be used in determining the condition of each of the valves listed below and submit it for Staff review by March 26, 1984. Possible methods include pressure monitoring, leak testing, radiography and ultrasonic testing.

CV-1906	*MO-1900	MO-1909	*V-19-005
CV-2002**	*MO-1901	MO-2003	
CV-2118	MO-1905	MO-2117	
CV-2138	MO-1908	MO-2137	

*Any two of these three.

**Corrected valve number.

Iowa Electric Response

Requirements for testing these valves is incorporated in Revision 5 of the DAEC Inservice Testing Program for Pumps and Valves (see Appendix B of Attachment 2).

V. COMPONENTS TO BE ADDED TO THE IST PROGRAM

NRC POSITION (from paragraph E of referenced SER)

Valves MO-4601 and MO-4602 (reactor recirculation pump suction isolation valves) were deleted from the IST program in Revision 4. These valves are Class 1 valves. In accordance with Technical Specification 4.6.G.2, Class 1 valves are to be tested in accordance with Section XI of the Code unless specific written relief has been granted by the NRC. Accordingly, these valves shall be tested per the Code until relief has been requested by the licensee and granted by the NRC.

Iowa Electric Response

Valves MOV-4601 and MOV-4602 (reactor recirculation pump suction isolation valves) were deleted from the DAEC IST Program in Revision 4 in accordance with ASME Boiler and Pressure Vessel Code, Section XI, paragraph IWV-1100. These valves are not required to perform a specific function in bringing the reactor to the cold shutdown condition nor in mitigating the consequences of an accident. The primary purpose of these valves is to provide isolation during maintenance and are considered Class 1 only due to their function as part of the reactor coolant system pressure boundary. Since these valves meet the exemption requirements of the Code, they are considered exempt from testing. Therefore, no specific relief request is required.

VI. CLARIFICATION OF IST PROGRAM TABULATIONS

NRC POSITION (from paragraph F of referenced SER)

Several items in the IST program require clarification. The licensee is required to confirm these items in writing by December 26, 1983.

<u>Component</u>	<u>Clarification</u>
1) V-24-8 V-24-12	These valves are verified to be in their safety-related position during the monthly test of the RCIC pump. A note should be added to the program tabulation to clarify this item.

<u>Component</u>	<u>Clarification</u>
2) CV-5719A CV-5719B CV-5703A CV-5703B	These valves are no longer in use and locked closed.
3) CV-2118 CV-2138	These valves are tested during cold shutdown rather than operation as indicated in the tabulation.

Iowa Electric Response

- 1) An appropriate note (Note No. 005) has been added to the IST Program to clarify the requirement for verification of the operation of check valves V-24-8 and V-24-12 during the periodic testing of the RCIC pumps (see page 67, Attachment 2, Appendix B).
- 2) The drywell cooling system backwash valves (CV-5703 A & B and CV-5719 A & B) are no longer used and are locked in the CLOSED position with keylocked remote handswitches.
- 3) The tabulation listing for CV-2118 and CV-2138 has been corrected to accurately reflect testing of these valves during refueling outages. Accordingly, Relief Request No. VR-33 is submitted for your consideration (see page 64 of Attachment 2).