

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

CENTRAL FILES

FEB 7 1977

Iowa Electric Light and Power
Company
ATTN: Mr. Duane Arnold
President

Docket No. 50-331

IE Towers
P.O. Box 351
Cedar Rapids, Iowa 52406

Gentlemen:

This acknowledges your Mr. Hammond's letter dated January 6, 1977, and his subsequent letter dated January 19, 1977, which corrected information provided in the previous letter. Your correspondence was in response to our letter dated December 28, 1976, regarding your Type C Leak Rate Test Report and MSIV leak rate testing.

We will examine your future leak rate testing activities during subsequent inspections.

Sincerely yours,

James G. Keppler
James G. Keppler
Regional Director

cc: Mr. E. L. Hammond
Chief Engineer

cc w/ltrs dtd 1/6/77
and 1/18/77:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC



ms
R

IOWA ELECTRIC LIGHT AND POWER COMPANY

DUANE ARNOLD ENERGY CENTER

P. O. Box 351

Cedar Rapids, Iowa 52406

January 6, 1977

DAEC - 77 - 11

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission-Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: 1976 Local Leak Rate Testing
Reference: Letter dated December 28, 1976, J. Keppler
to D. Arnold
File: A-102

Dear Mr. Keppler:

The above referenced letter requests that we provide your office with written justification which led to the decreasing of MSIV leak rate test duration time from one hour to fifteen minutes during the 1976 refuel local leak rate testing. We have reviewed the matter and have determined that the leak rate test duration was not reduced from one hour to fifteen minutes as stated in your letter.

The Surveillance Test Procedure that was used for the local leak rate testing specifies two methods to be used for testing of the MSIV's, the Pressurized Flowmeter Method and Pressure Decay Method. The Pressurized Flowmeter Method was used for testing the inboard MSIV's and the Pressure Decay Method was used for testing the outboard MSIV's. The procedure approved by the Operations Committee specified a minimum test duration time of one hour for the Pressure Decay Method of testing but did not specify a minimum test duration time for the Pressurized Flowmeter Method. Subsequent to approval of the Surveillance Test Procedure by the Operations Committee, a document revision was approved and issued which specifies a maximum test duration time of fifteen minutes for the Pressurized Flowmeter Method. Since a time duration had not previously been specified, this addition did not represent a change in the test duration requirement.

It should be noted that the revised procedure was in error by stating a maximum test duration time of fifteen minutes. The procedure should have stated minimum test duration requirements. The leak rate testing Surveillance Test Procedure will be revised to include the requirement that the test duration shall be such that the leak rate has stabilized or is decreasing. Although the procedure was in error, during the 1976 testing, the test duration for the Pressurized Method was sufficient to ensure accurate leak rate values for the respective MSIV's.

JAN 10 1977

January 6, 1977

In all cases, the leak rate was decreasing when the testing was terminated.

We would also like to comment on the item in your letter regarding the incorporation of appropriate considerations for valve degradation and as-left conditions of the MSIV's. It is our intention to follow our most current approved repair and testing procedures and conform to the existing Technical Specification requirements in existence at the time of valve testing and/or repair.

Very truly yours,

Ellery L. Hammond
Ellery L. Hammond
Chief Engineer
Duane Arnold Energy Center

ELH/DLW/mg