

IES UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear

July 19, 1994
NG-94-2443

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Revision to DAEC Commitments on Fire Protection
Reference: 1) Letter, G. Lear (NRC) to D. Arnold (IELP), Fire Protection Safety
Evaluation Report, dated June 1, 1978
2) Letter, T. Ippolito (NRC) to D. Arnold (IELP), Safety Evaluation
Report Supplement, dated February 19, 1981
File: A-100, P-72a

Dear Mr. Russell:

During our current effort to consolidate the Duane Arnold Energy Center (DAEC) Fire Protection program and evaluate existing commitments, we determined that certain elements implemented for the purpose of compliance to 10 CFR 50, Appendix R (Reference 2) have made many of our commitments (Reference 1) to the NRC Branch Technical Position, APCS 9.5-1, Appendix A, redundant. The purpose of this letter is to reaffirm our commitment to a reliable fire protection program which will assure that the DAEC can be operated safely and safely shutdown under any anticipated circumstances and withdraw these redundant commitments.

IES Utilities Inc. recently began research of fire protection commitments for the DAEC to generate a design basis summary document and to potentially reduce the cost of maintaining the program. We determined that several commitments for fire barriers and emergency lighting made in response to Appendix A are obviated by those elements of the fire protection program related to Appendix R. We therefore are retracting our previous commitments to Appendix A for the following elements:

- Three-hour rated fire barriers surrounding the Control Room, Cable Spreading Room, Switchgear Rooms, Battery Rooms, Main Turbine Oil Storage Area, Emergency Diesel Generator Rooms, Diesel Fuel Day Tank Rooms, Safety-Related Pump Areas, Heater Boiler Room, Stairwells, Radwaste Building and building exterior walls.
- Emergency Lighting for safety-related areas.

Instead of these Appendix A commitments, the determination of areas requiring three-hour rated fire barriers and emergency lighting is based on the safe shutdown analysis performed to comply with Appendix R. Three hour rated fire barriers are maintained where required to meet the separation requirements of 10 CFR 50 Appendix R, Section III.G. Emergency lighting is maintained in areas required for operation of, or access to, safe shutdown equipment as required by 10 CFR 50 Appendix R, Section III.J. The Appendix R barrier and lighting requirements may include some of the same areas that were maintained for Appendix A.

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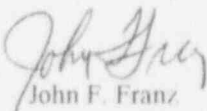
Fire Barrier requirements include the penetration seals, fire dampers, fire doors, protective cable coatings and structural steel fire proofing that form part of the barrier. If a fire barrier installed in response to our previous commitment to Appendix A is no longer required for DAEC compliance to Appendix R, then the Appendix A commitments for penetration seals, dampers, doors, cable coatings and steel fire proofing for that barrier are also superseded.

Some of the Appendix A barriers which are not required for Appendix R, may be maintained at our discretion for insurance purposes; however, maintenance of these barriers will not constitute a regulatory commitment.

As previously stated, we are making these changes in an attempt to reduce the burden of maintaining those elements of the DAEC fire protection program which are redundant and carry no added safety benefit. The DAEC will continue to maintain those elements necessary to assure compliance to the portions of 10 CFR 50, Appendix R applicable at DAEC. These changes have been evaluated against the criteria established in 10 CFR 50.59 and determined to present no unreviewed safety questions. All documentation regarding our evaluation of this matter is maintained at the DAEC site and is available for NRC review upon request.

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

Sincerely,


John F. Franz
Vice President, Nuclear

JFF/SRC/pjv+

cc: S. Catron
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