

IES UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear

September 6, 1994
NG-94-3072

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
RTS-243A, Amendment 197

Reference: 1) Letter, Franz (IELP) to Murley (NRC),
dated March 24, 1993, NG-93-0067,
RTS-243A
2) Letter, Pulsifer (NRC) to Liu (IES
Utilities Inc.), dated May 12, 1994,
TS Amendment 197

File: A-117, R-42, R-22, R-23

Dear Mr. Russell:

On May 12, 1994, Technical Specification (TS) Amendment 197 was issued (Reference 2). During our development of procedure changes to support implementation of that amendment, a question was raised regarding the scope of the Surveillance Requirement (SR) specified in TS Section 4.8.C.1 in light of the corresponding discussion in section 2.11 of the Safety Evaluation Report (SER) on the amendment. The scope of the SR is clearly the essential buses listed in Section 3.8.C.1, however, the SER and our TS change request (Reference 1) discuss the other breakers fed by those buses, which could lead to the conclusion that the scope of the SR is all the breakers on the buses "down to the motor control centers and lighting panels."

This letter confirms the clarification of the SR, which was discussed with members of your staff on July 26, 1994. SR 4.8.C.1 requires performance of inspections and preventive maintenance on the essential buses listed in 3.8.C.1 (see Attachment for list of circuit breakers included in the SR). These surveillances are performed once per 4 operating cycles. The discussions in our submittal and the SER regarding additional equipment provided background information concerning the basis for that frequency.

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Mr. William T. Russell, Director
NG-94-3072
September 6, 1994
Page 2

Typically, at the same time that we perform the SR, we also perform inspections and maintenance on the feeder breakers located in load centers and motor control centers one level below the buses listed. The scope of equipment to be inspected at that time is developed by Engineering and Maintenance personnel based on equipment function, service history and industry experience. We will continue to perform the inspections and maintenance on the other breakers in related equipment in accordance with our preventive maintenance program, but will not include them in our TS surveillance program.

During the development of our implementation plan of 10 CFR 50.65, (Maintenance Rule), we are establishing criteria for monitoring the overall performance of circuit breakers important to safety to assure their reliable performance.

This letter clarifies TS requirements and contains no new commitments.

We plan to implement this amendment by September 9, 1994. Should you have any questions regarding this matter, please contact this office.

Sincerely,



John F. Frantz
Vice President, Nuclear

Attachment: Circuit Breakers Included In Surveillance Requirement 4.8.C.1

JFF/SRC/pjv+

cc: S. Catron
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
J. Martin (Region III)
NRC Resident Office
S. Brown (State of Iowa)
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Circuit Breakers Included In Surveillance Requirement 4.8.C.1

Bus 1A3

1A301
1A302
1A303
1A304
1A305
1A306
1A307
1A308
1A309
1A310
1A311

Bus 1A4

1A401
1A402
1A403
1A404
1A405
1A406
1A407
1A408
1A409
1A410
1A411

Bus 1B3

1B0301
1B0302
1B0303
1B0304
1B0305

Bus 1B4

1B0401
1B0402
1B0403
1B0404
1B0405

Bus 1B9

1B0901
1B0902
1B0903

Bus 1B20

1B2001
1B2002
1B2003