

IES UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear
November 4, 1994
NG-94-3888

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

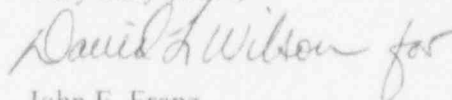
Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Requests for Relief from ASME Section XI
Requirements: NDE-012, NDE-013, NDE-014,
NDE-015
File: A-100, A-286b, A-351

Dear Mr. Russell:

While reviewing completed examination reports for the Second Ten Year Inservice Inspection (ISI) Interval for the Duane Arnold Energy Center (DAEC), we identified the need for relief from certain ASME Code requirements. In accordance with 10 CFR 50.55a(a)(3), these relief requests are herein submitted (Attachment). We request that they be approved as revisions to our Second Ten Year ISI Implementation Plan by June 30, 1995. This letter includes no new commitments.

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

Very truly yours,



John F. Franz
Vice President, Nuclear

JFF/LS/pjv

Attachment

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cc: C. Rushworth
L. Liu
L. Root
A. Hsia (NRC-NRR)
J. Martin (Region III)
NRC Resident Office
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DUANE ARNOLD ENERGY CENTER TEN YEAR EXAMINATION SUMMARY ASME SECTION XI SYSTEMS - REQUEST FOR RELIEF	CEDAR RAPIDS, IA	MAJOR ITEM: RFR NUMBER NDE-012 TABLE: SECTION 2.D PAGE 1 OF 1		
COMPONENT OR SYSTEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
HEA-CC-8 (1 THRU 4)	2	2.1	C-C	C3.10
<u>CODE REQUIREMENTS</u>				
SURFACE EXAMINATION OF ESSENTIALLY 100% OF WELD LENGTH ONCE DURING THE TEN YEAR INTERVAL.				
<u>BASIS FOR RELIEF</u>				
THE DESIGN OF THE SUPPORT DOES NOT ALLOW ACCESS TO THE ENTIRE LENGTH OF WELD AS REQUIRED FOR THE CODE EXAMINATION. IN ORDER TO PERFORM SURFACE EXAMINATION OF THE NORMALLY INACCESSIBLE LENGTH OF 14" OF EACH SUPPORT, THE RHR HEAT EXCHANGER WOULD BE REQUIRED TO BE SUPPORTED BY SOME ALTERNATE SUPPORTS WHILE THE BOLTS WERE REMOVED ALLOWING ACCESS FOR THE EXAMINATION. THE DOSE RATES IN THIS AREA ARE 50 TO 70 MR/HR. THE BENEFIT OF EXAMINING THE 14" OF WELD FOR EACH SUPPORT HAS ONLY A SMALL POTENTIAL OF INCREASING PLANT SAFETY MARGINS AND A VERY DISPROPORTIONATE IMPACT ON EXPENDITURES OF PLANT MANPOWER AND RADIATION EXPOSURE.				
<u>ALTERNATIVE EXAMINATION</u>				
PERFORM THE SURFACE EXAMINATION OF THE ACCESSIBLE 82.5% OF THE WELD LENGTH. THE ALTERNATE EXAMINATIONS COVERAGE ALLOWED BY CODE CASE N-460 WILL ALSO BE USED.				
<u>SCHEDULE FOR IMPLEMENTATION</u>				
SECOND TEN YEAR INTERVAL				

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DUANE ARNOLD ENERGY CENTER TEN YEAR EXAMINATION SUMMARY ASME SECTION XI SYSTEMS - REQUEST FOR RELIEF		CEDAR RAPIDS, IA	MAJOR ITEM: RFR NUMBER NDE-013 TABLE: SECTION 2.D PAGE 1 OF 1		
COMPONENT OR SYSTEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM	
RBA-J007	1	1.1	B-J	B9.11	
<u>CODE REQUIREMENTS</u> Volumetric examination which includes essentially 100% of weld length.					
<u>BASIS FOR RELIEF</u> The weld is a tee-to-flange configuration which limits the volumetric (UT) examination to a one-sided exam from the tee side. In addition, the tee configuration limits the one-side examination to 85% of the weld length. In order to perform a radiography of the weld the recirculation system would be required to be drained, thus increasing exposure to personnel for an additional 15% coverage. The benefit of examining the additional 15% weld length has only a small potential of increasing plant safety margins and a very disproportionate impact on expenditures of plant manpower and radiation exposure to perform the radiography.					
<u>ALTERNATIVE EXAMINATION</u> Perform the ultrasonic examination of the 85% weld length and utilize the alternative examination coverage allowed by Code Case N-460.					
<u>SCHEDULE FOR IMPLEMENTATION</u> This weld was included in the RFO08 Outage Summary Report. Second Ten-Year Interval					

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DUANE ARNOLD ENERGY CENTER TEN YEAR EXAMINATION SUMMARY ASME SECTION XI SYSTEMS - REQUEST FOR RELIEF	CEDAR RAPIDS, IA	MAJOR ITEM: RFR NUMBER NDE-014 TABLE: SECTION 1.0 PAGE 1 OF 1		
COMPONENT OR SYSTEM	ASME XI CODE CLASS	PROGRAM TABLE	CODE CATEGORY	CODE ITEM
RBA-J012 RBB-J012	1	1.1	B-J	B9.11
<u>CODE REQUIREMENTS</u>				
Volumetric examination which includes essentially 100% of weld length.				
<u>BASIS FOR RELIEF</u>				
These welds are a valve-to-weldolet configuration which limits the volumetric (UT) examination coverage to 76% of the weld length. In order to perform a radiography of the weld the recirculation system would be required to be drained, thus increasing exposure to personnel for the additional 24% coverage. The benefit of examining the additional 24% of weld length has only a small potential of increasing plant safety margins and a very disproportional impact on expenditures of plant manpower and radiation exposure.				
<u>ALTERNATIVE EXAMINATION</u>				
Perform ultrasonic examination of the 76% weld length utilizing the required 45 shear supplemented with a 70° Refracted longitudinal exam. The alternative examination coverage allowed by Code Case N-460 will also be used.				
<u>SCHEDULE FOR IMPLEMENTATION</u>				
RBA-J012 was included in RFO08 Outage Summary Report. RBB-J012 was included in RFO09 Outage Summary Report. Second Ten-Year Interval.				

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DUANE ARNOLD ENERGY CENTER
TEN YEAR EXAMINATION SUMMARY
ASME SECTION XI SYSTEMS -
REQUEST FOR RELIEF

CEDAR RAPIDS, IA

MAJOR ITEM: RFR NUMBER NDE-015
TABLE: SECTION 1.0
PAGE 1 OF 1

COMPONENT OR SYSTEM

ASME XI
CODE CLASS

PROGRAM
TABLE

CODE
CATEGORY

CODE
ITEM

CUB-F004

1

1.1

B-F

B5.B0

CODE REQUIREMENTS

Volumetric examination which includes essentially 100% of weld length.

BASIS FOR RELIEF

This weld is a elbow-to-valve configuration which limits the volumetric (UT) examination coverage to a one-sided exam. This results in approximately 70% coverage of the weld length. In order to perform a radiography of the weld the Reactor Water Cleanup System would be required to be drained, which would result in an increase in exposure to personnel for the additional 30% coverage. The benefit of examining the additional 30% weld length has only a small potential of increasing plant safety margins and a very disproportionate impact on expenditures of plant manpower and radiation exposure.

ALTERNATIVE EXAMINATION

Perform ultrasonic examination of the 70% weld length. The alternative examination coverage allowed by Code Case N-460 will also be used.

SCHEDULE FOR IMPLEMENTATION

This weld was included in RFO09 Outage Summary Report.
Second Ten-Year Interval.