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John F. Franz, Jr.
Vice President, Nuclear

March 23, 1995
NG-95-0927

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to Followup to the Request for Additional Information
Regarding Generic Letter 92-08.

References: 1) Letter, Zimmerman (NRC) to Liu (IES), dated December 23, 1994
2) Letter, Rasin (NEI) to Russell (NRC), dated January 17, 1995
3) Letter, Rasin (NEI) to Russell (NRC), dated February 21, 1995
4) Letter, Franz (IES) to Russell (NRC), NG-94-4314, dated December 12, 1994

File: A-101a, P-72a

Dear Mr. Russell:

We have reviewed your request for actions and information communicated in Reference 1. This request raises significant issues as discussed in the referenced NEI letter (Reference 2). As a result of the concerns expressed by NEI with this request, your staff provided for further dialogue on these issues at a meeting on March 14, 1995. That meeting occurred too close to the date of this letter for us to incorporate the meeting results into this response.

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We do plan to participate in the chemical testing of Thermo-Lag to be coordinated by NEI. That program was outlined in an NEI letter (Reference 3). We agree with NEI that consistent results obtained in that testing program will provide reasonable assurance that Thermo-Lag material is of uniform and consistent quality, and will provide a sound technical basis for cost effective assessment of existing plant installations.

Previously (Reference 4), we described our intent to eliminate reliance upon Thermo-Lag as a fire barrier on raceways in Appendix R applications. We do intend to retain the use of Thermo-Lag for certain other installations, such as structural steel. We are currently in the process of reviewing the needs for the various installations. In Reference 4, we also described our program and schedule for this effort. That schedule is very aggressive and the additional actions requested in Reference 1 could have an adverse impact on that schedule.

We will continue to consider the requests made in Reference 1 and the information provided at the meeting on March 14 and factor those issues into our overall plan for resolving the Thermo-Lag concern. We will provide our revised plan incorporating these issues along with a description of any modifications we deem necessary by July 1, 1995, as previously committed in Reference 4.

In our letter (Reference 4), we also described our intent to perform modifications to resolve certain Thermo-Lag installations by July 1, 1995. That schedule presumed completion of these modifications during the current refuel outage. Due to difficulties in obtaining the necessary materials, some of those modifications will not be completed until the next refuel outage, currently scheduled for the Fall of 1996. This schedule remains consistent with the overall resolution, which is expected to be complete by the end of 1996 (Reference 4). In the interim, we have identified some manual actions that can be implemented by operators which obviate the need for the affected fire barriers. The modifications will still be completed so that we will not rely on these operator actions beyond the next refuel outage.

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

The following revised commitment is made in this letter:

Along with the letter describing the scope and schedule for modifications necessary to resolve Thermo-Lag, provide information which addresses the latest NRC request for information (Reference 1) by July 1, 1995.

This letter is true and accurate to the best of my knowledge and belief.

IES UTILITIES INC.

By John F. Franz
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 23rd day of March, 1995,

by John F. Franz
Mary Michele O'Neal
Notary Public in and for the State of Iowa
June 8, 1995
Commission Expires



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cc: S. Catron
L. Liu
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