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John F. Franz, Jr.
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August 17, 1995
NG-95-2603

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 NRC Generic Letter (GL) 92-01, Revision 1, Supplement 1:
Reactor Vessel Structural Integrity

Reference: 1) NRC Generic Letter (GL) 92-01, Revision 1, Supplement 1:
Reactor Vessel Structural Integrity
2) Letter from J. Beckham (BWR Vessel & Internals Project) to
U.S. NRC dated August 10, 1995.

File: A-101b, B-11

Dear Mr. Russell:

Generic Letter (GL) 92-01, Revision 1, Supplement 1 was issued on May 19, 1995. This GL requested that licensees identify, collect and report any new data pertinent to the analysis of the structural integrity of their reactor pressure vessels (RPVs). Licensees were also asked to assess the impact of that data on their RPV integrity analyses and provide the NRC with certain information. The requested information is included in the attachment to this letter.

In addition, the BWR Vessel & Internals Project (VIP) has provided a generic response (Reference 2) to the requests in the GL. As discussed in our attached response to the GL, we plan to work closely with the BWR VIP in their efforts.

This letter makes the following new commitment:

Review the Reactor Vessel Integrity Database (RVID) for discrepancies with
Duane Arnold Energy Center data.

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An IES Industries Company

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

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 17th day of August, 1995,
by John F. Franz.



Mary Michele O'Neal
Notary Public in and for the State of Iowa
June 8, 1998
Commission Expires

Attachment

JFF/CJR/so

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cc: C. Rushworth
L. Liu
L. Root
B. Fisher
D. Mineck
G. Kelly (NRC-NRR)
H. Miller (Region III)
NRC Resident Office
Docu

IES UTILITIES INC. RESPONSE TO GL 92-01, REVISION 1, SUPPLEMENT 1

NRC Request 1:

A description of those actions taken or planned to locate all data relevant to the determination of RPV integrity, or an explanation of why the existing data base is considered complete as previously submitted.

IES Utilities Inc. Response:

The Duane Arnold Energy Center (DAEC) beltline plate and weld metal data has been reviewed on several previous occasions. Fabrication records were thoroughly reviewed by both IES and General Electric engineers. For this reason, we believe the data transmitted previously in response to GL 92-01, Rev. 1, is correct. To ensure its accuracy, however, we plan to review the Reactor Vessel Integrity Database (RVID) which has recently been made available (NRC Administrative Letter 95-03: Availability of Reactor Vessel Integrity Database).

We are also working with the BWR Vessel and Internals Project (VIP) in their efforts to review and evaluate records of beltline materials. We plan to review their results and resolve any inconsistencies as appropriate.

NRC Request 2:

An assessment of any change in best-estimate chemistry based on consideration of all relevant data.

IES Utilities Inc. Response:

We will work closely with the BWR VIP to review the data retrieved during their efforts to respond to NRC Request 1. Based on their results, the current pressure-temperature (P-T) curves will be reviewed as necessary to ensure adequate safety margin.

NRC Request 3:

A determination of the need for use of the ratio procedure in accordance with the established Position 2.1 of Regulatory Guide 1.99, Revision 2, for those licensees that use surveillance data to provide a basis for the RPV integrity evaluation.

IES Utilities Inc. Response:

The DAEC has only one set of surveillance data; therefore this is not a near-term issue. We plan to remove our second set of surveillance samples during Refueling Outage (RFO) 14 which is currently scheduled to begin in October, 1996. At that time, we will make a determination on whether use of the ratio procedure is appropriate.

NRC Request 4:

A written report providing any newly acquired data as specified above and (1) the results of any necessary revisions to the evaluation of RPV integrity in accordance with the requirements of 10 CFR 50.60, 10 CFR 50.61, Appendices G and H to 10 CFR Part 50, and any potential impact on the LTOP or P-T limits in the technical specifications or (2) a certification that previously submitted evaluations remain valid. Revised evaluations and certifications should include consideration of Position 2.1 of Regulatory Guide 1.99, Revision 2, as applicable, and any new data.

IES Utilities Inc. Response:

As discussed previously, we are working closely with the BWR VIP in their efforts to resolve RPV integrity concerns. We believe our data to be complete; however, should new data be found, we will evaluate its impact on the DAEC's RPV integrity, as appropriate, and report those findings to you.