

## Iowa Electric Light and Power Company

August 31, 1984  
NG-84-3544

Mr. James G. Keppler  
Regional Administrator  
Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
NRC IE Bulletin 79-14,  
File: A-101a

Dear Mr. Keppler:

The purpose of this letter is to confirm the information previously given to you concerning discrepancies between some of the as-installed seismic pipe supports at the DAEC and the associated design drawings. They were discovered during a recent in-plant audit by Iowa Electric of Bulletin 79-14 which was being conducted in conjunction with the 10 year In-Service Inspection program.

The original Bulletin 79-14 activity was carried out by our contractor, Bechtel. As a part of that activity, a walkdown was performed on seismic pipe systems in order to verify that the plant as-built configurations were reflected in the drawings. That walkdown involved location of the support on the piping system within a specified tolerance, and comparison of support configuration with the design drawings. The information gathered during the walkdown was used to verify the location and function of the support as required to verify the seismic analysis. The result of this effort was the conclusion that the seismic analysis of DAEC is valid for seismic piping systems as actually installed.

The discrepancies noted to date have been associated with the pipe support detail drawings, and none have been found in pipe routing or valve configuration. As they are identified they are evaluated by Engineering and the information is compared to the data generated for the Bulletin 79-14 response. The supports that have been re-examined show no adverse affect to

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the structural integrity of the support and therefore have no adverse effects on the safety of the plant or the public. Additionally, calculations completed for the Bulletin 79-14 work are being reviewed to verify the validity of the results.

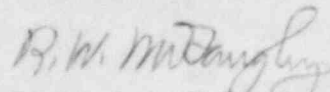
As of this time we have found nothing which would invalidate the conclusions of our previous report. However, we believe it is prudent to reverify design conditions of the subject pipe supports and to re-confirm the conclusion of the Bulletin 79-14 analysis.

If we find that safety margins are exceeded on any DAEC system, immediate action will be taken to declare the system inoperable and follow the action statements as required by the DAEC Technical Specifications. If such action occurs, the NRC will be notified as required by 10 CFR 50.72 and/or 10 CFR 50.73.

Iowa Electric is actively pursuing a program to resolve this matter. Within 30 days we will provide a follow-up response which will outline the results of our work reassessment and provide a schedule for resolution. This response will be based on a walkdown of sections of the Bulletin 79-14 package which will be aimed at giving us a high degree of confidence in our assessment of the work which was done by our contractor under Bulletin 79-14.

Based upon the information currently available, Iowa Electric cannot determine whether a similar situation may exist at other utilities.

Sincerely,



Richard W. McGaughy  
Manager, Nuclear Division

RWM/BWR/dmb\*

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