

CMB

Iowa Electric Light and Power Company

November 15, 1984
NG-84-5153

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

Re: Duane Arnold Energy Center
Subject: Docket No. 50-331
Operating License No.: DPR-49
NRC IE Bulletin 79-14
Reference: NG-84-4277, October 1, 1984
File: A-53j, A-101a

Dear Mr. Keppler:

This letter is submitted to provide the assessment of our original IE Bulletin 79-14 work, as outlined in the referenced letter. This assessment covers the first two activities described in that letter: a re-walkdown of certain DAEC piping systems and an assessment of the evaluations of discrepancies found in the original walkdown. To date, all re-walkdown and assessment efforts have confirmed our previous belief that the discrepancies discovered in the original 79-14 work are not a safety concern.

The first activity has been completed with a total of 22 accessible and 23 inaccessible systems being examined in the re-walkdown. The comparison of this re-walkdown data to the original 79-14 walkdown data has shown that data on pipe routing and support locations was acceptable and met the intent of Bulletin 79-14. The discrepancies arise in the comparison of pipe support detail drawings, which were apparently not emphasized in the original walkdown. These discrepancies are related to pipe support construction, not function, and therefore have had no effect on the seismic adequacy of the systems involved.

The second activity, the assessment of the evaluations of discrepancies identified in the original work, has also been completed with 21 of the original walkdown packages being examined. The results show a deficiency in the organization and completeness of the packages and in documentation of resolution of discrepancies. However, following re-evaluation, all these deficiencies have been judged to be minor and have had no impact on the seismic adequacy of the systems involved.

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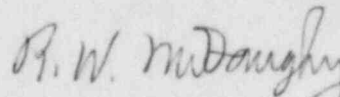
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Having completed this program, we have found nothing which would invalidate our original 79-14 report. We feel, however, that two areas warrant additional attention. The first is the verification of the accuracy of the pipe support detail drawings. Therefore, we are expanding the scope of our previous activities to continue our walkdown and will now evaluate all pipe supports covered by Bulletin 79-14. The second area is the validation of the original package documentation, which was described as the third activity in the referenced letter. To address this area, Bechtel will continue their detailed review of all the original 79-14 packages to identify and resolve any documentation inconsistencies.

The investigation and resolution of this issue has been given focused attention. We will submit a final report summarizing the results of our expanded program upon its completion, which is currently scheduled for June 1, 1985.

Sincerely,



Richard W. McGaughy
Manager, Nuclear Division

RWM/MJM/cg*

cc: M. Murphy
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NRC Resident Office
Commitment Control No. 84-0284