



Duane Arnold Energy Center  
3277 DAEC Road  
Palo, IA 52324  
Telephone 319 851 7611  
Fax 319 851 7611

February 19, 1996  
NG-96-0241

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  
Request for Reduced Inspections due to  
Implementation of Hydrogen Water Chemistry

References: 1. Letter from G. Kelly (NRC) to L. Liu (IES) dated January 24, 1995;  
Subject: Safety Evaluation of Duane Arnold Energy Center Request for  
Reduced Inspection due to Implementation of Hydrogen Water  
Chemistry  
  
2. NG-95-3122, Letter from J. Franz (IES) to W. Russell (NRC) dated  
October 31, 1995

File: A-101b, A-286a, B-31c, B-31f

Dear Mr. Russell:

By letter dated January 24, 1995 (Reference 1), the NRC provided a Safety Evaluation (SE) of our request for a reduction in the frequency of inspections for intergranular stress corrosion cracking (IGSCC) in the reactor recirculation piping. We had submitted that relief request in accordance with positions outlined in Generic Letter 88-01 and based on the implementation of Hydrogen Water Chemistry (HWC) at the Duane Arnold Energy Center (DAEC).

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In the SE, the Staff concluded that the DAEC had implemented an acceptable HWC program and could reduce IGSCC inspections during Refueling Outage (RFO) 13, which was completed in April, 1995. The Staff stated that in order to continue the reduced inspection frequency in future refueling outages, the DAEC should meet a calibration requirement for electrochemical potential (ECP) measurement and that "such calibration should be performed at least once every fuel cycle to ensure the coolant in the external autoclaves is representative of that in the recirculation piping system."

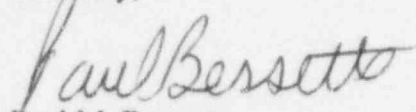
In a letter dated October 31, 1995 (Reference 2), IES Utilities requested that the NRC eliminate the requirement for in situ verification of ECP each fuel cycle, as such verification would be excessively burdensome to perform. An attachment to that letter provided the justification for our request.

We recently discussed this matter with your Staff and were informed that the NRC is awaiting further dialogue with the BWR Owners' Group (BWROG) in an effort to generically resolve the issue of in situ verification. We understand that this matter may not be generically resolved prior to the start of RFO 14, currently scheduled to begin in October, 1996. We therefore request that the in situ calibration requirement be eliminated for RFO 14. This will enable us to continue performing IGSCC inspections at the reduced frequency provided by the relief, while we await final resolution of this issue.

This letter contains no new NRC commitments.

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

Sincerely,



Paul M. Bessette  
Manager, Nuclear Licensing

PMB/CJR/cjr  
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cc: C. Rushworth  
L. Liu  
J. Franz  
G. Kelly (NRC-NRR)  
H. Miller (Region III)  
NRC Resident Office  
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