



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

February 18, 1993

Docket No. 50-331

Mr. Lee Liu  
Chairman of the Board and  
Chief Executive Officer  
Iowa Electric Light and Power Company  
Post Office Box 351  
Cedar Rapids, Iowa 52406

Dear Mr. Liu:

SUBJECT: RESPONSE TO GENERIC LETTER 92-04 "RESOLUTION OF THE ISSUES  
RELATED TO REACTOR VESSEL WATER LEVEL INSTRUMENTATION  
IN BOILING WATER REACTORS" (TAC M84278)

This letter acknowledges receipt of your response to Generic Letter (GL) 92-04, dated September 28, 1992. GL 92-04 was issued by letter dated August 19, 1992, to all operating Boiling Water Reactor (BWR) Licensees. GL 92-04 requested licensees to promptly assess the impact on their facilities of potentially erroneous level indication due to non-condensable gases, and to implement compensatory measures and long term corrective actions as necessary.

We find acceptable:

- (1) Duane Arnold Energy Center (DAEC) review and acceptance of the BWR Owners Group (BWROG) generic analysis as being applicable to DAEC.
- (2) DAEC endorsement of the BWROG commitment, outlined in its letter dated August 12, 1992, regarding schedule and plans for actions to address postulated errors in BWR water level instrumentation.
- (3) DAEC endorsement of the BWROG's Emergency Procedures Committee guidance letter dated August 19, 1992. This letter provides guidance for operator action in the event of level indication errors due to non-condensable gases during RPV depressurization. We also understand that you have sensitized your operators to these potential errors consistent with the BWROG guidance.
- (4) DAEC commitment to implement the longer term BWROG finding resulting from their experimental and analytical programs on a schedule consistent with the BWROG program, as documented in their letter of August 12, 1992, and discussed at the October 29, 1992, meeting with the NRC.

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Mr. Lee Liu

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On October 23, 1992, the BWROG approved refined operator guidance developed by the Emergency Procedures Committee, sent to your Operations Superintendent on October 16, 1992, for response to instrument errors due to non-condensable gases. We feel that this guidance provides appropriate information for operators to adequately identify and deal with potentially inaccurate RPV level instrumentation, and expect that this or equivalent guidance, has been incorporated into your station operations.

Should you have any questions, please contact me at (301) 504-3016.

Sincerely,

*for Jon B. Hoptis*

Robert M. Pulsifer, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

cc: See next page

Mr. Lee Liu  
Iowa Electric Light and Power Company

Duane Arnold Energy Center

cc:

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Kathleen H. Shea, Esquire  
Newman and Holtzinger  
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Chairman, Linn County  
Board of Supervisors  
Cedar Rapids, Iowa 52406

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Palo, Iowa 52324

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U.S. Nuclear Regulatory Commission  
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Utilities Division  
Iowa Department of Commerce  
Lucas Office Building, 5th Floor  
Des Moines, Iowa 50319

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Sincerely,

original signed by Jon Hopkins for

Robert M. Pulsifer, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

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DATE	2/17/93	2/17/93 <i>JRH for</i>	2/18/93

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