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October 31, 1996
NG-96-2341

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
Inservice Inspection Relief Requests; Use of Code Case N-535

Reference: NG-96-1807, J. Franz (IES) to NRC, dated September 30, 1996,
Response to NRC Request for Additional Information on Third 10-
Year Interval Inservice Inspection Program Plan and Associated
Requests for Relief

File: A-100, A-286

The referenced letter transmitted relief requests NDE- R024, NDE-R025 and NDE-R026 for the Duane Arnold Energy Center (DAEC) third 10-year interval inservice inspection (ISI) program. These relief requests were discussed with the Staff on October 21, 1996 and October 24, 1996. Based on these discussions, IES Utilities hereby withdraws these relief requests. In addition, we request authorization to use the alternatives described in ASME Section XI Code Case N-535.

As stated in footnote 6 to 10 CFR 50.55a, the use of Code Cases may be authorized by the Director of the Office of Nuclear Reactor Regulation pursuant to 10 CFR 50.55a(a)(3). According to 10 CFR 50.55a(a)(3), the proposed alternatives must provide an "acceptable level of quality and safety." Use of Code Case N-535 does so, as discussed in the attachment.

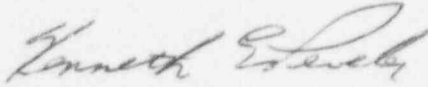
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An IES Industries Company

IES Utilities requests authorization to use Code Case N-535 during the DAEC's third 10-year inservice inspection interval, which begins on November 1, 1996. Should you have any questions regarding these matters, please contact this office.

Sincerely,



Kenneth E. Peveler
Manager, Nuclear Licensing and Emergency Planning

Attachment

cc: C. Rushworth
L. Liu
J. Franz
G. Kelly (NRC-NRR)
A. B. Beach (Region III)
NRC Resident Office
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EVALUATION OF CODE CASE N-535

COMPONENT(S) FOR WHICH ALTERNATIVE TESTING WILL BE USED

Code Class: 1, 2, and 3

Reference: IWA-2430(d)

Examination Category: Not Applicable

Item Number: Not Applicable

Description: Scheduling of Inservice Inspections for Components
inspected under Program B.

CODE REQUIREMENT

IWA-2430(d) states "For components inspected under Program B, each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals."

ALTERNATIVE TESTING

Code Case N-535 allows examinations to be performed to satisfy the requirements of the extended interval in conjunction with examinations performed to satisfy the requirements of the successive interval. An examination performed to satisfy requirements of either the extended interval or the successive interval shall not be credited to both intervals.

Code Case N-535 states "That portion of an inspection interval described as an inspection period may be reduced or extended by as much as one year to enable an inspection to coincide with a plant outage. This adjustment shall not alter the requirements for scheduling inspection intervals. The inspection interval for which an examination was performed shall be identified on examination records."

The DAEC refueling outage (RFO) 14 encompasses both the third period of the second ten year interval and the first period of the third ten year interval. The examinations performed in RFO 14 will not be credited to both intervals and the summary report shall identify the interval in which the examinations will be credited. Per IWB-2420(a) and IWC-2420(a), "The sequence of component examinations established during the first inspection interval shall be repeated during each successive inspection interval, to the extent practical."

BASIS FOR ALTERNATIVE TESTING

Allowing examinations for two intervals within the same outage, while not crediting to the same interval, does not degrade the structural integrity of the systems/components being examined. It allows the most efficient use of available resources. Radiation exposure can be maintained as low as reasonably achievable (ALARA) by allowing the nozzle welds and inner radii to be scheduled in conjunction with bioshield removal for performing the reactor pressure vessel weld examinations.

JUSTIFICATION FOR USE OF ALTERNATE EXAMINATION

Use of Code Case N-535 will continue to ensure the structural integrity of the systems/components examined by the DAEC ISI program. Use of the Code Case will not alter the requirements for scheduling inspection intervals. Per IWB-2420(a) and IWC-2420(a), "The sequence of component examinations established during the first inspection interval shall be repeated during each successive inspection interval, to the extent practical." Thus, an acceptable level of quality and safety will have been achieved and public health and safety will not be endangered by allowing the proposed alternative per Code Case N-535.

IMPLEMENTATION SCHEDULE

The Code Case will be used during the third ten-year interval of the Inservice Inspection Program for DAEC.