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April 6, 2000

NG-00-0431

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Station 0-P1-17
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Revision To Technical Specification Change Request TSCR-011 (TSCR-011A): "Control Building Envelope Allowed Outage Time"

Reference Letter NG-99-0276, dated May 10, 1999, From John F. Franz (IES) to NRC, "Technical Specification Change Request (TSCR-011): Control Building Envelope Allowed Outage Time"

File: A-117

The above referenced letter submitted a Technical Specification Change Request to revise the Duane Arnold Energy Center's (DAEC's) Technical Specifications based upon Generic Traveler #TSTF-287, Revision 2 (Ventilation System Envelope Allowed Outage Time). Recently however, Revision 5 to TSTF-287 was approved by the NRC. Therefore, DAEC is submitting this revision (TSCR-011A) to the original Technical Specification Change Request (TSCR-011). This revision is consistent with the Standard Technical Specification (NUREG-1433, Improved Standard Technical Specifications for General Electric BWR/4 Plants) Generic Traveler #TSTF-287, Revision 5.

This revision only revises the Bases Insert B.1 of the original submittal (TSCR-011). The revised insert states that during the period that the control building boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19)

A001

should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and to ensure physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition.

This proposed revision is acceptable because it provides additional means to minimize the consequences of potential hazards. Examples of such compensatory measures are:

a) Verify self-contained breathing apparatus (SCBA) equipment is available for the operating crew to use if determined necessary by the Operations Shift Supervisor (OSS) in the unlikely event a hazardous environment arises.

b) Ensure the Security Department is notified of any impairment affecting security access control.

This revision of the submittal does not require a revision to the No Significant Hazards Consideration, the Safety Assessment, or the Environmental Consideration of the original submittal (TSCR-011).

Approval of the original application with this revision is requested by May 10, 2000. To allow sufficient time for implementation, we request the effective date of this amendment be at least 60 days after the date of approval.

The following commitment is made in this letter:

Written procedures will be available describing compensatory measures to be taken in the event of an intentional or unintentional entry into Technical Specification 3.7.4 Condition B.

This submittal, including the revision, is not risk-informed. This revision does not constitute a new submittal because it does not affect Technical Specification pages. It only adds compensatory measures to the Bases, as stated in Revision 5 to TSTF-287.

This letter is true and accurate to the best of my knowledge and belief.

IES UTILITIES INC.

By Gary D. VanMiddlesworth for DLW
David L. Wilson
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 6th day of March, 2000,

by Gary D. VanMiddlesworth

NANCY S. FRANCK

Nancy S. Franck
Notary Public in and for the State of Iowa

9-28-01
Commission Expires

Attachment: PROPOSED BASES REVISION TO TECHNICAL SPECIFICATION CHANGE REQUEST TSCR-011 (TSCR-011A)

cc: D. Barta
E. Protsch
G. VanMiddlesworth
B. Mozafari (NRC-NRR)
J. Dyer (Region III)
D. McGhee (State of Iowa)
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PROPOSED BASES REVISION TO TECHNICAL SPECIFICATION CHANGE REQUEST TSCR-011 (TSCR-011A)

The holders of license DPR-49 for the Duane Arnold Energy Center propose to revise the Technical Specification Change Request TSCR-011 by deleting the referenced Bases INSERT 1 and replacing it with the enclosed new INSERT 1.

SUMMARY OF REVISION:

Page	Description of Change
B 3.7-21	Delete previously proposed Bases INSERT 1 and replace with revised INSERT 1, for inoperable control building boundary.

Revised INSERT 1

B.1

If the main control building boundary is inoperable in MODES 1, 2, and 3, the SFU trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE control building boundary within 24 hours. During the period that the control building boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and to ensure physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a typically reasonable time to diagnose, plan and possibly repair, and test most problems with the control building boundary.