

NG-01-0474  
April 9, 2001

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  
Technical Specification Change Request  
TSCR-037 - Alternative Source Term,  
Fuel Handling Accident

Reference: NG-01-0382, dated March 23, 2001, G. Van Middlesworth (NMC)  
to NRC, Response to Request for Additional Information (RAI)  
to Technical Specification Change Request  
TSCR-037 - Alternative Source Term

File: A-117, A-225

The referenced letter submitted "marked-up" pages of a proposed revision to the Duane Arnold Energy Center (DAEC) Technical Specifications (TS). The attachment to this letter contains "clean typed" pages of those "marked-up" TS pages.

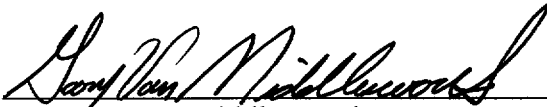
A copy of this submittal is being forwarded to our appointed state official pursuant to 10 CFR Section 50.91.

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

A001

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

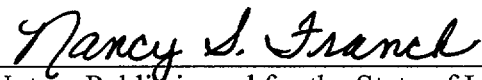
NUCLEAR MANAGEMENT COMPANY, LLC

By   
Gary Van Middlesworth  
DAEC Site Vice-President

State of Iowa  
(County) of Linn

Signed and sworn to before me on this 9<sup>th</sup> day of April, 2001,

by Gary Van Middlesworth.

  
Notary Public in and for the State of Iowa



9-28-01  
Commission Expires

Attachment

cc: M. Wadley (w/o)  
M. Shuaibi (NRC-NRR) (w/a)  
B. Mozafari (NRC-NRR) (w/a)  
J. Dyer (Region III) (w/a)  
D. McGhee (State of Iowa) (w/a)  
NRC Resident Office (w/a)  
Docu (w/a)

# Secondary Containment Isolation Instrumentation 3.3.6.2

Table 3.3.6.2-1 (page 1 of 1)  
Secondary Containment Isolation Instrumentation

| FUNCTION  | APPLICABLE<br>MODES OR<br>OTHER<br>SPECIFIED<br>CONDITIONS | REQUIRED<br>CHANNELS<br>PER<br>TRIP SYSTEM | SURVEILLANCE<br>REQUIREMENTS                                 | ALLOWABLE<br>VALUE  |
|---|--|--|--|---------------------|
| 1. Reactor Vessel Water<br>Level - Low                | 1,2,3,<br>(a)  | 2  | SR 3.3.6.2.1<br>SR 3.3.6.2.3<br>SR 3.3.6.2.4<br>SR 3.3.6.2.5 | $\geq 165.6$ inches |
| 2. Drywell Pressure - High                            | 1,2,3  | 2  | SR 3.3.6.2.3<br>SR 3.3.6.2.4<br>SR 3.3.6.2.5                 | $\leq 2.2$ psig     |
| 3. Reactor Building Exhaust<br>Shaft - High Radiation | 1,2,3,<br>(a)  | 1  | SR 3.3.6.2.2<br>SR 3.3.6.2.3<br>SR 3.3.6.2.4<br>SR 3.3.6.2.5 | $\leq 12.8$ mR/hr   |
| 4. Refueling Floor Exhaust<br>Duct - High Radiation   | 1,2,3,<br>(a)  | 1  | SR 3.3.6.2.2<br>SR 3.3.6.2.3<br>SR 3.3.6.2.4<br>SR 3.3.6.2.5 | $\leq 10.6$ mR/hr   |

(a) During operations with a potential for draining the reactor vessel.

### 3.6 CONTAINMENT SYSTEMS

#### 3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
During Operations with a Potential for Draining the Reactor  
Vessel (OPDRVs).

#### ACTIONS

| CONDITION   | REQUIRED ACTION   | COMPLETION TIME |
|---|---|-----------------|
| A. Secondary containment inoperable in MODE 1, 2, or 3.                   | A.1 Restore secondary containment to OPERABLE status.   | 4 hours         |
| B. Required Action and associated Completion Time of Condition A not met. | B.1 Be in MODE 3.<br><u>AND</u>   | 12 hours        |
|   | B.2 Be in MODE 4.   | 36 hours        |
| C. Secondary containment inoperable during OPDRVs.                        | C.1 -----NOTE-----<br>LCO 3.0.3 is not applicable.<br>-----<br><br>Initiate action to suspend OPDRVs. | Immediately     |

(continued)

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE |  | FREQUENCY                           |
|--------------|--|-------------------------------------|
| SR 3.6.4.1.1 | Verify all secondary containment equipment hatches are closed.   | 31 days                             |
| SR 3.6.4.1.2 | <p>-----NOTE-----<br/>Doors in high radiation areas may be verified by administrative means.<br/>-----</p> <p>Verify that either the outer door(s) or the inner door(s) in each secondary containment access opening are closed.</p> | 31 days                             |
| SR 3.6.4.1.3 | Verify each SBT subsystem can maintain $\geq 0.25$ inch of vacuum water gauge in the secondary containment at a flow rate $\leq 4000$ cfm.   | 24 months on a STAGGERED TEST BASIS |

### 3.6 CONTAINMENT SYSTEMS

#### 3.6.4.2 Secondary Containment Isolation Valves/Dampers (SCIV/Ds)

LC0 3.6.4.2 Each SCIV/D shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
During Operations with a Potential for Draining the Reactor  
Vessel (OPDRVs).

#### ACTIONS

- NOTES-----
1. Penetration flow paths may be unisolated intermittently under administrative controls.
  2. Separate Condition entry is allowed for each penetration flow path.
  3. Enter applicable Conditions and Required Actions for systems made inoperable by SCIV/Ds.
- 

| CONDITION   | REQUIRED ACTION   | COMPLETION TIME |
|---|---|-----------------|
| A. One or more penetration flow paths with one SCIV/D inoperable. | A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve/damper, closed manual valve, or blind flange. | 8 hours         |
|   | <u>AND</u>  | (continued)     |

ACTIONS (continued)

| CONDITION  | REQUIRED ACTION  | COMPLETION TIME |
|--|--|-----------------|
| D. Required Action and associated Completion Time of Condition A or B not met during OPDRVs. | <p>D.1 -----NOTE-----<br/> LC0 3.0.3 is not applicable.<br/> -----</p> <p>Initiate action to suspend OPDRVs.</p> | Immediately     |

### 3.6 CONTAINMENT SYSTEMS

#### 3.6.4.3 Standby Gas Treatment (SBGT) System

LCO 3.6.4.3 Two SBGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
During Operations with a Potential for Draining the Reactor  
Vessel (OPDRVs).

#### ACTIONS

| CONDITION  | REQUIRED ACTION  | COMPLETION TIME                |
|--|--|--------------------------------|
| A. One SBGT subsystem inoperable.  | A.1 Restore SBGT subsystem to OPERABLE status.                   | 7 days                         |
| B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, or 3. | B.1 Be in MODE 3.  | 12 hours                       |
|  | <u>AND</u><br>B.2 Be in MODE 4.                                  | 36 hours                       |
| C. Required Action and associated Completion Time of Condition A not met during OPDRVs.      | -----NOTE-----<br>LCO 3.0.3 is not applicable.<br>-----          | Immediately<br><br>(continued) |
|  | C.1 Place OPERABLE SBGT subsystem in operation.<br><br><u>OR</u> |                                |



ACTIONS

| CONDITION   | REQUIRED ACTION   | COMPLETION TIME |
|---|---|-----------------|
| C. (continued)  | C.2 Initiate action to suspend OPDRVs.  | Immediately     |
| D. Two SBGT subsystems inoperable in MODE 1, 2, or 3. | D.1 Enter LCO 3.0.3.  | Immediately     |
| E. Two SBGT subsystems inoperable during OPDRVs.      | E.1 -----NOTE-----<br>LCO 3.0.3 is not applicable.<br>-----<br><br>Initiate action to suspend OPDRVs. | Immediately     |

(continued)

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE |  | FREQUENCY                   |
|--------------|--|-----------------------------|
| SR 3.6.4.3.1 | Operate each SBGT subsystem for $\geq 10$ continuous hours with heaters operating.   | 31 days                     |
| SR 3.6.4.3.2 | <p>-----NOTE-----</p> <p>When a SBGT subsystem is placed in an inoperable status solely for the performance of VFTP testing required by this Surveillance <u>on the other subsystem</u>, entry into associated Conditions and Required Actions may be delayed for up to 1 hour.</p> <p>-----</p> <p>Perform required SBGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p> | In accordance with the VFTP |
| SR 3.6.4.3.3 | Verify each SBGT subsystem actuates on an actual or simulated initiation signal.   | 24 months                   |
| SR 3.6.4.3.4 | Verify each SBGT filter cooler bypass damper can be opened and the fan started.  | 24 months                   |