



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

April 26, 1990

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: AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-49  
(TAC NOS. 66458/74620)

The Commission has issued the enclosed Amendment No. 165 to Facility Operating License No. DPR-49 for the Duane Arnold Energy Center (DAEC). This amendment consists of changes to the Technical Specifications in response to your application dated June 30, 1987, as revised September 1, 1989.

The amendment revises the DAEC Technical Specifications to conform with the model Technical Specifications relating to control room habitability recommended in NRC Generic Letter 83-36. These revisions include changes in nomenclature for consistency with current plant surveillance procedures, changes in surveillance requirements to more clearly specify test acceptance criteria, and the addition of a requirement to demonstrate that the control room can be automatically isolated and maintained at a positive pressure upon receipt of a high radiation signal. Other minor editorial changes or clarifications are included.

Your staff has informally requested that the implementation date for the enclosed amendment be deferred until August 31, 1990. This schedule would allow additional time to develop procedures and establish an acceptable test method for demonstrating that a positive control room pressure can be maintained, as specified in Surveillance Requirement(SR) 4.10.3. This SR is performed once per operating cycle (typically prior to startup from an outage). Your next refueling outage is scheduled for June 28 through September 5, 1990, and you plan to conduct the required surveillance prior to startup from that outage. Thus, the actual surveillance will not be deferred beyond the time it would normally be performed. Therefore, we find that deferral of implementation until no later than August 31, 1990 is acceptable and this is so noted in the enclosed amendment.

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P PDC

DFO  
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Mr. Lee Liu

- 2 -

April 26, 1990

A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

/s/

James R. Hall, Project Manager  
Project Directorate III-3  
Division of Reactor Projects - III,  
IV, V & Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 165 to License No. DPR-49
2. Safety Evaluation

cc w/enclosures:

See next page

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Office:	LA/PDIII-3	PM/PDIII-3	PD/PDIII-3	OGC-WF1*
Surname:	PKreutzer	RHall/tg	JHannon	RBachmann
Date:	4/19/90	7/19/90	4/26/90	4/3/90

DOCUMENT NAME: 66458/74620 AMD

Mr. Lee Liu  
Iowa Electric Light and Power Company

Duane Arnold Energy Center

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A copy of the related Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

James R. Hall, Project Manager  
Project Directorate III-3  
Division of Reactor Projects - III,  
IV, V & Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.        to License No. DPR-49
2. Safety Evaluation

cc w/enclosures:  
See next page

Office: LA/PDIII-3  
Surname: PKreutzer  
Date: 3/14/90

PM/PDIII-3  
RHall/tp  
3/14/90

PD/PDIII-3  
JHannon  
7/14/90

OGC-WF1  
R Bachmann  
4/5/90

*JFO*  
*1/1*

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/s/

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Office: LA/PDIII-3	PM/PDIII-3	PD/PDIII-3	OGC-WF1*
Surname: PKreutzer	RHall/tg	JHannon	RBachmann
Date: 4/19/90	4/19/90	4/26/90	4/3/90



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

IOWA ELECTRIC LIGHT AND POWER COMPANY  
CENTRAL IOWA POWER COOPERATIVE  
CORN BELT POWER COOPERATIVE

DOCKET NO. 50-331

DUANE ARNOLD ENERGY CENTER

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 165  
License No. DPR-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Iowa Electric Light and Power Company, et al., dated June 30, 1987 as revised September 1, 1989 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-49 is hereby amended to read as follows:

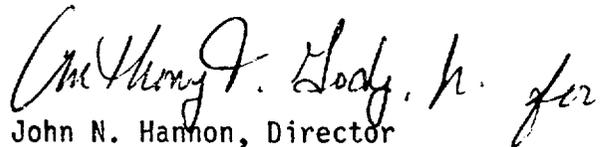
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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 165, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of the date of issuance and shall be implemented no later than August 31, 1990.

FOR THE NUCLEAR REGULATORY COMMISSION



John N. Hamon, Director  
Project Directorate III-3  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 26, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 165

FACILITY OPERATING LICENSE NO. DPR-49

DOCKET NO. 50-331

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Pages

iii  
3.10-1  
3.10-2  
3.10-2a\*  
3.10-3  
3.10-4  
3.10-5  
3.10-6

\*New Page

<u>LIMITING CONDITION FOR OPERATION</u>	<u>SURVEILLANCE REQUIREMENTS</u>	<u>PAGE NO.</u>
3.7 Containment Systems	4.7	3.7-1
A. Primary Containment	A	3.7-1
B. Standby Gas Treatment	B	3.7-15
C. Secondary Containment	C	3.7-17
D. Primary Containment Power Operated Isolation Valves	D	3.7-18
3.8 Auxiliary Electrical Systems	4.8	3.8-1
A. Auxiliary Electrical Equipment	A	3.8-1
B. Operation with Inoperable Components	B	3.8-3
C. Emergency Service Water System	C	3.8-6
3.9 Core Alterations	4.9	3.9-1
A. Refueling Interlocks	A	3.9-1
B. Core Monitoring	B	3.9-4
C. Spent Fuel Pool Water Level	C	3.9-4
3.10 Additional Safety Related Plant Capabilities	4.10	3.10-1
A. Main Control Room Ventilation	A	3.10-1
B. Remote Shutdown Panels	B	3.10-2a
3.11 River Level Specification	4.11	3.11-1
3.12 Core Thermal Limits	4.12	3.12-1
A. Maximum Average Planar Linear Heat Generation Rate	A	3.12-1
B. Linear Heat Generation Rate	B	3.12-2
C. Minimum Critical Power Ratio	C	3.12-3

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p data-bbox="214 262 787 325"><b>3.10 ADDITIONAL SAFETY RELATED PLANT CAPABILITIES</b></p> <p data-bbox="289 346 516 388"><u>Applicability:</u></p> <p data-bbox="289 399 787 556">Applies to the operating status of the main control room ventilation standby filter unit system and the Remote Shutdown Panels.</p> <p data-bbox="289 577 454 619"><u>Objective:</u></p> <p data-bbox="289 630 820 861">To assure the availability of the main control room ventilation standby filter unit system, and Remote Shutdown Panels under the conditions for which the capability is an essential response to station abnormalities.</p> <p data-bbox="214 882 755 924"><b>A. MAIN CONTROL ROOM VENTILATION</b></p> <p data-bbox="214 934 820 1417">           1. Except as specified in Specifications 3.9.D and 3.10.A.3, the main control room ventilation standby filter unit system shall be OPERABLE at all times when SECONDARY CONTAINMENT INTEGRITY is required.             2.a The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show <math>\geq 99\%</math> DOP removal and <math>\geq 99\%</math> halogenated hydrocarbon removal.         </p>	<p data-bbox="868 262 1445 325"><b>4.10 ADDITIONAL SAFETY RELATED PLANT CAPABILITIES</b></p> <p data-bbox="943 346 1170 388"><u>Applicability:</u></p> <p data-bbox="943 399 1485 630">Applies to the surveillance requirements for the main control room ventilation standby filter unit system and the Remote Shutdown Panels which are required by the corresponding Limiting Conditions for Operation.</p> <p data-bbox="943 640 1109 682"><u>Objective:</u></p> <p data-bbox="943 693 1477 861">To verify operability or availability under conditions for which these capabilities are an essential response to station abnormalities.</p> <p data-bbox="868 882 1412 924"><b>A. MAIN CONTROL ROOM VENTILATION</b></p> <p data-bbox="868 934 1485 1470">           1. Annually, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate.             2.a The tests and sample analysis of Specification 3.10.A.2 shall be performed initially and then annually for standby service or after every 720 hours of system operation and following significant painting, fire or chemical release in any ventilation zone communicating with the system.         </p>

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>b. The results of laboratory carbon sample analysis shall show <math>\geq 90\%</math> radioactive methyl iodide removal at a face velocity of 40 fpm, 0.05 to 0.15 mg/m<sup>3</sup> inlet iodide concentration, <math>\geq 95\%</math> R.H. and <math>\geq 125^\circ\text{F}</math>.</p>	<p>b. Each main control room ventilation standby filter unit subsystem shall be demonstrated OPERABLE after each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove <math>\geq 99\%</math> of a halogenated hydrocarbon refrigerant test gas when they are tested in-place while operating the subsystem at the design flow rate.</p>
<p>c. System flow shall be 1000 cfm <math>\pm 10\%</math>.</p>	<p>c. Each main control room ventilation standby filter unit subsystem shall be demonstrated OPERABLE after each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove <math>\geq 99\%</math> of the cold dioctyl phthalate (DOP) when they are tested in-place while operating the subsystem at the design flow rate.</p>
<p>3.a. During POWER OPERATION or Reactor Startup from and after the date that one of the main control room ventilation standby filter unit subsystems is made or found to be inoperable, restore the inoperable subsystem to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.</p>	<p>d. Monthly, each main control room ventilation standby filter unit subsystem shall be demonstrated OPERABLE by initiating flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 10 hours.</p>
	<p>3. Once per OPERATING CYCLE, automatic initiation of the main control room ventilation standby filter unit system shall be demonstrated by verifying that upon receipt of a high radiation test signal at the air intake radiation monitors, the system automatically switches to the isolation mode and the control room is maintained at a positive pressure of greater than or equal to 1/10 inch water gauge under calm wind conditions (<math>&lt; 5</math> mph) relative to the outside atmosphere at a flow rate of 1000 cfm <math>\pm 10\%</math>.</p>

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>b. In the COLD SHUTDOWN or REFUELING mode, with one main control room ventilation standby filter unit filtration subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 7 days or initiate and maintain operation of the OPERABLE subsystem in the isolation mode of operation or suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.</p>	
<p>c. In the COLD SHUTDOWN or REFUELING mode, with both main control room ventilation standby filter unit subsystems inoperable, IMMEDIATELY suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.</p>	
<p>B. <u>REMOTE SHUTDOWN PANELS</u></p>	<p>B. <u>REMOTE SHUTDOWN PANELS</u></p>
<p>1. At all times when not in use or being maintained the Remote Shutdown Panels (Bay "A" Door) and local control panels shall be locked.</p>	<p>1. The Remote Shutdown Panels (Bay "A" Door) and local control panels shall be visually checked once per week to verify they are locked.</p> <p>2. Operability of the switches on the Remote Shutdown Panels shall be functionally tested once per operating cycle.</p>

## 3.10.A BASES

MAIN CONTROL ROOM VENTILATION

The control room air treatment system is designed to filter the control room atmosphere for intake air and/or for recirculation during control room isolation conditions. The control room air treatment system is designed to automatically start upon control room isolation and to maintain the control room pressure to the design positive pressure.

In the event of a control room isolation and air treatment system start, the control room will be maintained at least 1/10 inch water gage pressure above outdoor pressure, under calm wind conditions (i.e., less than 5 miles per hour wind speed), to assure continued long-term control room habitability. Other areas in the control building that directly communicate with the control room via HVAC system ductwork or doors are required to maintain a positive pressure relative to the adjacent areas. This will assure that leakage is from the control building to the adjacent areas or outdoors.

High efficiency particulate absolute (HEPA) filters are installed before the charcoal adsorbers to prevent clogging of the iodine adsorbers. The charcoal adsorbers are installed to reduce the potential intake of radioiodine to the control room. The in-place test results should indicate a system leak tightness of less than 1 percent bypass leakage for the charcoal adsorbers and a HEPA efficiency of at least 99 percent removal of DOP particulates. The laboratory carbon sample test results should indicate a radioactive methyl iodide removal efficiency of at least 90 percent for expected accident conditions. If the

## DAEC-1

efficiencies of the HEPA filters and charcoal adsorbers are as specified, the resulting doses will be less than the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50. Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers.

If one of the systems is found to be inoperable, the second unit provides protection and reactor operation, fuel handling operations may be performed for a limited period of time while repairs are being made. If the system cannot be repaired within seven days, the reactor is shut down and brought to hot shutdown within 12 hours and cold shutdown within the following 24 hours, fuel handling operations or operations with the potential for draining the vessel are terminated.

### B. REMOTE SHUTDOWN PANELS

The Remote Shutdown Panels are provided to assure the capability of controlling reactor pressure for taking the plant to the hot shutdown condition external to the control room for the unlikely condition that the control room becomes uninhabitable.

## 4.10.A BASES

MAIN CONTROL ROOM VENTILATION

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than six inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop should be determined at least annually to show system performance capability.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. Testing of the adsorbers shall be in accordance with the standards given in the DAEC Updated FSAR, Section 9.4. Test cartridges are provided to allow removal of a representative charcoal sample without affecting the operation of the bed. If test results are unacceptable, all adsorbent in the system shall be replaced with an adsorbent qualified according to Table 4.10-1. The replacement tray for the adsorber tray removed for the test should meet the same adsorbent quality. Standards for testing and replacing HEPA filters are also given in Section 9.4 of the Updated FSAR. Any HEPA filters found defective shall be replaced. The HEPA filter separators should be capable of withstanding iodine removal sprays. HEPA filters should be tested individually by the appropriate Filter Test Facility listed in the current USNRC Health and Safety Bulletin for Filter Unit Inspection and Testing Service. The Filter Test Facility should test each filter at 100% and 20% of rated flow, with the filter encapsulated to disclose frame and gasket leaks.

Operation of the system for 10 hours every month will demonstrate operability of the filters and adsorber system and remove excessive moisture built up on the adsorber.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign materials, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the operator on duty at the time of the incident. Knowledgeable staff members should be consulted prior to making this determination.

Demonstration of the automatic initiation capability is necessary to assure system performance capability.

B. REMOTE SHUTDOWN PANELS

Once per week verification of the panels being properly secured is considered adequate. The associated equipment is proven operable during surveillance testing of that equipment. An operability verification by functional test once per operating cycle is adequate to assure that the panels are available and can perform their design function.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-49

IOWA ELECTRIC LIGHT AND POWER COMPANY  
CENTRAL IOWA POWER COOPERATIVE  
CORN BELT POWER COOPERATIVE

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 INTRODUCTION

On November 1, 1983, the NRC issued Generic Letter (GL) 83-36, "NUREG-0737 Technical Specifications." The letter requested that all nuclear power plant licensees revise their Technical Specifications to be consistent with the guidance contained in the generic letter. The licensee, Iowa Electric Light and Power Company (IELP), has closed out all of the issues addressed in the generic letter with the exception of Item III.D.3.4, "Control Room Habitability Requirements." By letter dated June 30, 1987, as revised September 1, 1989, IELP submitted proposed changes to the Duane Arnold Energy Center (DAEC) Technical Specifications (TSs) to more closely conform with the model TSs relating to control room habitability recommended in GL 83-36. Other minor editorial changes and clarifications were also proposed.

2.0 EVALUATION

The licensee has proposed changes to Sections 3.10, 4.10 and the associated Bases of the DAEC TSs. Most of the changes are editorial in nature, to properly reflect current plant nomenclature or to improve clarity. The most significant change is the revision of Surveillance Requirement 4.10.A.3, to demonstrate that a positive pressure can be maintained in the control room when the standby filter unit system is automatically isolated. Each of the proposed changes is discussed below, according to the page(s) on which it appears.

Pages iii and 3.10-1

The Table of Contents and text are revised to read "Remote Shutdown Panels" instead of "Emergency Shutdown Control Panel(s)." This change will reflect current plant nomenclature and design, as the Remote Shutdown Panels were installed to comply with 10 CFR Part 50, Appendix R, and effectively replaced the emergency shutdown control panels. Also, page iii includes a revised page number to reflect other changes and page 3.10-1 includes a minor grammatical correction. These editorial changes improve the clarity and accuracy of the TSs and are therefore acceptable.

Pages 3.10-2 and 3.10-2a

Limiting Condition for Operation (LCO) 3.10.A.2.c is revised to read "...1000 cfm  $\pm$  10%," versus "...1000 cfm  $\pm$  100 cfm." This is a minor editorial change for consistency with other TSs and surveillance procedures and is therefore acceptable.

New LCOs 3.10.A.3.a., b and c replace existing LCOs 3.10.A.3 and 3.10.A.4. The new LCOs more clearly state the required actions for each operating mode when one or both of the main control room standby filter unit subsystems are inoperable. The new LCOs are consistent with the recommendations of GL 83-36 and are therefore acceptable.

Surveillance Requirements (SR) 4.10.A.2.b.c and d are also revised to more closely conform to the recommendations of GL 83-36. The revised SRs more explicitly identify the operability test requirements for the main control room standby filter unit subsystems. Therefore, these changes are acceptable.

Surveillance Requirement 4.10.3 is revised to explicitly require that once per operating cycle it is demonstrated that the main control room standby filter unit subsystems are automatically isolated and the control room is maintained at a positive pressure of at least 1/10 inch water gauge, upon receipt of a high radiation test signal at the air intake radiation monitors. This SR also closely conforms with the recommendation of GL 83-36 and clarifies the current general requirement. GL 83-36 recommends a minimum value of 1/8 inch water gauge to assure that a positive pressure exists in the control room. The revised SR for the DAEC specifies that a positive pressure of 1/10 inch water gauge under calm wind conditions (< 5mph) be maintained. The design of the DAEC control building ventilation system is such that a pressure of 1/8 inch cannot be maintained reliably; however, a pressure of 1/10 inch can be maintained. The intent of this surveillance requirement is to assure that the control room remains habitable and that radiation exposure to personnel remains less than 5 rem whole body following an accident, in accordance with 10 CFR Part 50, Appendix A, General Design Criterion 19. The staff believes that the proposed SR meets the goal of demonstrating a positive pressure differential sufficient to minimize potential inleakage of radiation into the control room following an accident, and is therefore acceptable.

LCO 3.10.B and SR 4.10.B are revised to reflect the nomenclature "Remote Shutdown Panels," as discussed above. The term "secured" is also replaced by the term "locked," to be more precise. These changes improve the clarity of the TSs and are therefore acceptable.

Pages 3.10.3 through 3.10-6

Pages 3.10-3 through 3.10-6 contain the Bases for sections 3.10 and 4.10 and are revised to reflect the changes to those sections. References to testing standards for charcoal adsorbers and HEPA filters were revised to refer to the DAEC Final Safety Analysis Report, thereby improving consistency. Other minor editorial changes to the Bases were made to improve clarity. The staff finds these changes acceptable.

In summary, the proposed changes will revise the DAEC TSs related to control room habitability to more closely conform with the NRC staff-recommended TSs in GL 83-36. The changes will also clarify the intent of current TSs and make other editorial improvements. Therefore, the staff finds the proposed changes acceptable.

### 3.0 ENVIRONMENTAL CONSIDERATIONS

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or a change to a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). This amendment also involves changes in record-keeping, reporting or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. R. Hall

Dated: April 26, 1990