

August 25, 1992

Docket No. 50-331

DISTRIBUTION:

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

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Dear Mr. Liu:

SUBJECT: AMENDMENT NO.186 TO FACILITY OPERATING LICENSE NO. DPR-49
(TAC NO. M82166)

The Commission has issued the enclosed Amendment No.186 to Facility Operating License No. DPR-49 for the Duane Arnold Energy Center. This amendment consists of changes to the Technical Specifications in response to your application dated November 15, 1991.

The amendment revises the Technical Specifications applicable to loading fuel assemblies adjacent to Source Range Monitors, adds Limiting Conditions for Operation and Surveillance Requirements, and makes administrative changes.

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,

original signed by

Clyde Y. Shiraki, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No.186 to License No. DPR-49
- 2. Safety Evaluation

cc w/enclosures:
See next page

OFC	LA/PD33/DRPW	PM/PD33/DRPW	D/PD33/DRPW	OGC
NAME	PKreutzer	CShiraki:cs	JHannon	MZYoung
DATE	7/17/92 8/6/92	8/6/92 8/25/92	8/6/92	8/15/92

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

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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
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Dear Mr. Liu:

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Sincerely,

A handwritten signature in cursive script, appearing to read "C. Y. Shiraki".

Clyde Y. Shiraki, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.186 to
License No. DPR-49
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. Lee Liu
Iowa Electric Light and Power Company

Duane Arnold Energy Center

cc:

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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. 186
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 November 15, 1991, 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.186 , 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 within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Clyde Y. Shiraki, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of issuance: August 25, 1992

ATTACHMENT TO LICENSE AMENDMENT NO.186

FACILITY OPERATING LICENSE NO. DPR-49

DOCKET NO. 50-331

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

Remove

iii
1.0-5
3.9-1 through 3.9-11

Insert

iii
1.0-5
3.9-1 through 3.9-11

<u>LIMITING CONDITIONS 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	3.9-5
	C. Spent Fuel Pool Water Level	C	3.9-6
	D. Auxiliary Electrical Equipment - CORE ALTERATIONS	D	3.9-6
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

19. ALTERATION OF THE REACTOR CORE (CORE ALTERATION)

The addition, removal, relocation or movement of fuel, sources, incore instruments* or reactivity controls within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of the movement of a component to a safe conservative position.

* Routine replacement of incore detectors (e.g. LPRMs, Traversing Incore Probes, etc.) that are not otherwise required to be OPERABLE does not constitute CORE ALTERATIONS.

20. REACTOR VESSEL PRESSURE

Unless otherwise indicated, reactor vessel pressures listed in the Technical Specifications are those measured by the reactor vessel steam space detectors.

21. THERMAL PARAMETERS

- a. Minimum Critical Power Ratio (MCPR) - The value of critical power ratio (CPR) for that fuel bundle having the lowest CPR.
- b. Critical Power Ratio (CPR) - The ratio of that fuel bundle power which would produce boiling transition to the actual fuel bundle power.
- c. Transition Boiling - Transition boiling means the boiling regime between nucleate and film boiling. Transition boiling is the regime in which both nucleate and film boiling occur intermittently with neither type being completely stable.
- d. Limiting Control Rod Pattern - A limiting control rod pattern for rod withdrawal error (RWE) exists when a) core thermal power is greater than or equal to 30% of rated and less than 90% of rated ($30\% \leq P < 90\%$) and the MCPR is less than 1.70, or b) core thermal power is greater than or equal to 90% of rated ($P \geq 90\%$) and the MCPR is less than 1.40.
- e. Linear Heat Generation Rate - The heat output per unit length of fuel pin.
- f. Fraction of Rated Power (FRP) - The fraction of rated power is the ratio of core thermal power to rated thermal power of 1658 MWth.
- g. Total Peaking Factor (TPF) - The ratio of local LHGR for any specific location on a fuel rod divided by the core average LHGR associated with the fuel bundles of the same type operating at the core average bundle power.
- h. Maximum Total Peaking Factor (MTPF) - The largest TPF which exists in the core for a given class of fuel for a given operating condition.

LIMITING CONDITIONS FOR OPERATION

3.9 CORE ALTERATIONS

Applicability:

Applies to fuel handling and core reactivity limitations during refueling and CORE ALTERATIONS.

Objective:

To ensure that core reactivity is within the capability of the control rods and to prevent criticality during refueling.

Specification:A. Refueling Interlocks

1. The reactor mode switch shall be locked in the "Shutdown" or "Refuel" position during CORE ALTERATIONS.
 - a. The reactor mode switch may be placed in the RUN, Startup/Hot Standby, and Shutdown position to test the switch interlock functions provided:
 - 1) All control rods remain fully inserted in core cells containing one or more fuel assemblies except for the control rod that is being exercised to test interlock functions, and
 - 2) No other CORE ALTERATIONS are in progress.
 - b. The refueling interlocks shall be OPERABLE except as specified in Specification 3.9.A.4.
2. Fuel shall not be loaded into the reactor core unless all control rods are fully inserted except as specified in Specification 3.9.A.4.

SURVEILLANCE REQUIREMENTS

4.9 CORE ALTERATIONS

Applicability:

Applies to the periodic testing of those interlocks and instrumentation used during refueling and CORE ALTERATIONS.

Objective:

To verify the operability of instrumentation and interlocks used in refueling and CORE ALTERATIONS.

Specification:A. Refueling Interlocks

1. Prior to any fuel handling with the head off the reactor vessel, those refueling interlocks applicable to the equipment being used shall be functionally tested. They shall be tested at weekly intervals thereafter until no longer required. They shall also be tested following any repair work associated with the interlocks.
 - a. The fuel grapple hoist load switch shall be set at ≤ 400 lbs.
 - b. If the frame-mounted auxiliary hoist, the monorail-mounted auxiliary hoist, or the service platform hoist is to be used for handling fuel with the head off the reactor vessel, the load limit switch on the hoist to be used shall be set at ≤ 400 lbs.
2. Observe that any control rod drive mechanism which has been uncoupled from and subsequently re-coupled to its control rod does not go to the overtravel position.

LIMITING CONDITIONS FOR OPERATION3. Single Control Rod/Drive Mechanism Withdrawal or Removal

With fuel in the reactor pressure vessel, one

- control rod, or
- control rod drive mechanism, or
- control rod and the associated control drive mechanism

may be withdrawn or removed from the core provided 3.9.A.3.a, b, c and d are satisfied until a control rod and associated control rod drive mechanism are re-installed and the control rod is fully inserted.

a. One of the following conditions is met:

- 1) The four fuel assemblies are removed from the core cell surrounding the control rod and/or control rod drive mechanism undergoing withdrawal or removal, or
- 2) the directional control valves are electrically disarmed on at least the other control rods in the 5 x 5 array centered on the control rod and/or control rod drive mechanism undergoing withdrawal or removal.

SURVEILLANCE REQUIREMENTS3. Single Control Rod/Drive Mechanism Withdrawal or Removal

Prior to withdrawal or removal of one

- control rod, or
- control rod drive mechanism, or
- control rod and the associated control rod drive mechanism

from the core (and at least daily thereafter), verify that the conditions stated in 3.9.A.3.a, and b, and c, and d are met until no longer required.

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

- b. One of the following reactivity conditions is met:
- 1) The reactivity margin requirements in Specification 3.3.A.1 are met except that:
 - a) The control rod selected for withdrawal or removal may be assumed to be the highest worth rod required to be assumed fully withdrawn for verification of SHUTDOWN MARGIN, and
 - b) The control rod selected for withdrawal or removal need not be assumed to be untrippable or stuck, or
 - 2) it can be verified by demonstration or analysis that the core is subcritical with a margin of at least 0.38% $\Delta k/k$ at any time.
- c. The conditions for Core and Containment Cooling systems as required by Specification 3.5.G are met.
- d. All other control rods are fully inserted in the core.

LIMITING CONDITIONS FOR OPERATION4. Multiple Control Rods/Drive Mechanisms Withdrawal or Removal

With fuel in the reactor pressure vessel, any number of

- control rods, or
- control rod drive mechanisms, or
- control rods and associated control rod drive mechanisms

may be withdrawn or removed from the core provided the following conditions are satisfied until all control rods and control rod drive mechanisms are re-installed and all control rods are fully inserted in the core.

- a. The reactor mode switch is locked in the "Refuel" position and all "Refueling Interlocks" are OPERABLE except that the Refuel position "One-Rod-Out" Interlock function may be bypassed for control rods and/or control rod drive mechanisms undergoing withdrawal or removal after the four fuel assemblies have been removed as specified below.
- b. The four fuel assemblies are removed from the core cell surrounding control rods and/or control rod drive mechanisms undergoing withdrawal or removal.
- c. One of the following reactivity conditions is met:
 - 1) The reactivity margin requirements in Specification 3.3.A.1 are met, or
 - 2) it can be verified by demonstration or analysis that the core is subcritical with a margin of at least 0.38% $\Delta k/k$ at any time.
- d. The conditions for Core and Containment Cooling systems as required by Specification 3.5.G are met.
- e. All other control rods are fully inserted in the core unless the surrounding four fuel assemblies have been removed from the core cell.

SURVEILLANCE REQUIREMENTS4. Multiple Control Rods/Drive Mechanisms Withdrawal or Removal

Prior to withdrawal or removal of

- control rods, or
- control rod drive mechanisms, or
- control rods and associated control rod drive mechanisms

from the core (and at least daily thereafter), verify that the conditions stated in 3.9.A.4.a, and b, and c, and d, and e are met until no longer required.

LIMITING CONDITIONS FOR OPERATIONB. Core Monitoring

1. During CORE ALTERATIONS two SRMs shall be OPERABLE - one in the core quadrant where fuel or control rods are being moved, and one in an adjacent quadrant, except as specified in Specifications 3.9.B.2 and 3.9.B.3. For an SRM to be considered OPERABLE, the following conditions shall be satisfied:
 - a. The SRMs shall be inserted to the normal operating level. (Use of special movable, dunking type detectors during CORE ALTERATIONS in place of normal detectors is permissible as long as the detector is connected to the normal SRM circuit.)
 - b. The SRMs shall have a minimum of 3 cps with all rods fully inserted in the core.
2. Prior to spiral unloading, the SRMs shall be proven OPERABLE as stated in Specifications 3.9.B.1; however, during spiral unloading the count rate may drop below 3 cps when the last bundles remaining in the core that surround the SRMs are being unloaded.
3. Prior to spiral reloading, two to four fuel assemblies which have previously accumulated exposure in the reactor shall be loaded next to each of the 4 SRMs to obtain the required 3 cps. Until these assemblies have been loaded, the 3 cps requirement is not necessary.

SURVEILLANCE REQUIREMENTSB. Core Monitoring

1. The SRMs shall be functionally tested prior to CORE ALTERATIONS and daily thereafter as long as CORE ALTERATIONS are underway.
2. The SRMs shall be checked for neutron response prior to spiral unloading and daily as long as fuel is in the core.

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTSC. Spent Fuel Pool Water Level

1. Whenever irradiated fuel is stored in the spent fuel pool, the pool water level shall be maintained at a level of at least 36 feet.
- a. Whenever the spent fuel storage pool water level is found to be less than 36 feet the following actions shall be taken:
 - 1) Immediately suspend movement of irradiated fuel assemblies in the spent fuel storage pool and place any load suspended in or above the spent fuel pool or reactor vessel into a safe configuration, and
 - 2) Immediately take action to establish SECONDARY CONTAINMENT INTEGRITY.

D. Auxiliary Electrical Equipment - CORE ALTERATIONS

1. CORE ALTERATIONS shall not be performed unless all of the following conditions are satisfied:
 - a. At least one off-site power source and either the startup or standby transformers are OPERABLE and capable of supplying power to the 4kV emergency buses.
 - b. One diesel-generator is OPERABLE with:
 - 1) its associated standby gas treatment system train OPERABLE, and
 - 2) its associated main control room ventilation standby filter unit subsystem OPERABLE.

C. Spent Fuel Pool Water Level

1. Whenever irradiated fuel is stored in the spent fuel pool, the water level shall be recorded daily.

3.9 BASES:

1. Refueling Interlocks

The refueling interlocks are designed to back up procedural core reactivity controls during refueling operations. The interlocks prevent an inadvertent criticality during refueling operations when the reactivity potential of the core is being altered.

To minimize the possibility of loading fuel into a cell containing no control rod, it is required that all control rods (excluding those bypassed as per 3.9.A.4.a) are fully inserted when fuel is being loaded into the reactor core. This requirement assures that during refueling the refueling interlocks, as designed, will prevent inadvertent criticality.

The refueling interlocks reinforce operational procedures that prohibit taking the reactor critical under certain situations encountered during refueling operations by restricting the movement of control rods and the operation of refueling equipment.

The refueling interlocks include circuitry which senses the condition of the refueling equipment and the control rods. Depending on the sensed condition, interlocks are actuated which prevent the movement of the refueling equipment or withdrawal of control rods (rod block).

Circuitry is provided which senses the following conditions:

1. All rods inserted.
2. Refueling platform positioned near or over the core.
3. Refueling platform hoists are fuel-loaded (fuel grapple, frame mounted hoist, monorail mounted hoist).

4. Fuel grapple not full up.
5. Service platform hoist fuel-loaded.
6. One rod withdrawn.

When the mode switch is in the "Refuel" position, interlocks prevent the refueling platform from being moved over the core if a control rod is withdrawn and fuel is on a hoist. Likewise, if the refueling platform is over the core with fuel on a hoist, control rod motion is blocked by the interlocks. When the mode switch is in the refuel position, only one control rod can be withdrawn. The refueling interlocks, in combination with core nuclear design and refueling procedures, limit the probability of an inadvertent criticality. The nuclear characteristics of the core assure that the reactor is subcritical even when the highest worth control rod is fully withdrawn. The combination of refueling interlocks for control rods and the refueling platform provide redundant methods of preventing inadvertent criticality even after procedural violations. The interlocks on hoists provide yet another method of avoiding inadvertent criticality.

Fuel handling is normally conducted with the fuel grapple hoist. The total load on this hoist when the interlock is required consists of the weight of the fuel grapple and the fuel assembly. This total is approximately 900 lbs., in comparison to the load-trip setting of 400 lbs. Provisions have also been made to allow fuel handling with either of the three auxiliary hoists and still maintain the refueling interlocks. The 400 lb. load-trip setting on these hoists is adequate to trip the interlock when one of the more than 600-lb. fuel bundles is being handled.

During certain periods, it is desirable to perform maintenance on more than one control rod and/or control rod drives at the same time. The maintenance is performed with the mode switch in the "refuel" position to provide the refueling interlocks normally available during refueling operations. In order to withdraw another control rod after withdrawal of the first rod, it is necessary to bypass the

refueling interlock on the first control rod which prevents more than one control rod from being withdrawn at the same time. The requirement that an adequate shutdown margin be verified (by either demonstration or analysis) ensures that inadvertent criticality cannot occur during this maintenance. The adequacy of the shutdown margin is verified by demonstration or analysis that the core is shut down by a margin of 0.38 percent $\Delta k/k$ with the strongest operable control rod fully withdrawn, or at least 0.38 percent $\Delta k/k$ shutdown margin is available if the remaining control rods have had their directional control valves disarmed. Disarming the directional control valves does not inhibit control rod scram capability.

Specification 3.9.A.4 allows unloading of a significant portion of the reactor core. This operation is performed with the mode switch in the "refuel" position to provide the refueling interlocks normally available during refueling operations. In order to withdraw more than one control rod, it is necessary to bypass the refueling interlock on each withdrawn control rod which prevents more than one control rod from being withdrawn at a time. The requirement that the fuel assemblies in the cell controlled by the control rod be removed from the reactor core before the interlock can be bypassed ensures that withdrawal of another control rod does not result in inadvertent criticality. Each control rod provides primary reactivity control for the fuel assemblies in the cell associated with that control rod.

Thus, removal of an entire cell (fuel assemblies plus control rod) results in a lower reactivity potential of the core. The requirements for SRM operability during these core alterations assure sufficient core monitoring.

2. Core Monitoring

The SRMs are provided to monitor the core during periods of station shutdown and to guide the operator during refueling operations and station startup. Requiring two operable SRMs in or adjacent to any core quadrant where fuel or control rods are being moved assures adequate monitoring of that quadrant during such alterations.

The requirement of 3 counts per second provides assurance that neutron flux is being monitored and insures that startup is conducted only if the source range flux level is above the minimum assumed in the control rod drop accident.

During spiral unloading, it is not necessary to maintain 3 cps because core alterations will involve only reactivity removal and will not result in criticality.

The loading of two to four bundles around the SRMs before attaining the 3 cps is permissible because any square 2 x 2 array of fuel bundles will have a K-effective of less than 0.95, even under maximum reactivity conditions (i.e., no control material is present and the bundles are at their maximum reactivity exposure) provided that:

1. a minimum of 12 inches of water exists between the array of fuel bundles and any surrounding bundles, and
 2. their maximum reactivity exposure corresponds to individual K-infinity values that are not in excess of 1.31.
3. Spent Fuel Pool Water Level

To assure that there is adequate water to shield and cool the irradiated fuel assemblies stored in the pool, a minimum pool water level is established. The minimum water level above the top of the fuel is established to provide adequate shielding and is well above the level to assure adequate cooling.

4.9 BASES:

1. Refueling Interlocks

Complete functional testing of all refueling interlocks before any refueling outage will provide positive indication that the interlocks operate in the situations for which they were designed. By loading each hoist with a weight less than or equal to the fuel assembly, positioning the refueling platform and withdrawing control rods, the interlocks can be subjected to valid operational tests. Where redundancy is

provided in the logic circuitry, tests can be performed to assure that each redundant logic element can independently perform its functions.

2. Core Monitoring

Requiring the SRMs to be functionally tested prior to CORE ALTERATIONS assures that the SRMs will be operable at the start of that alteration. The daily response check of the SRMs ensures their continued operability.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 186 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

By letter dated November 15, 1991, Iowa Electric Light and Power Company (IEL&P), the licensee for the Duane Arnold Energy Center (DAEC), transmitted an application for amendment to Operating License DPR-49 regarding proposed changes to Appendix A of the DAEC Technical Specifications (TS). The proposed TS changes are primarily revisions regarding "CORE ALTERATIONS" for the TS Section 3.9 "Limiting Conditions for Operation" (LCO) and the TS Section 4.9 "Surveillance Requirements" (SR), and the associated Bases.

The proposed license amendment would (1) revise the requirements applicable to the loading of fuel assemblies adjacent to a Source Range Monitor (SRM) when establishing the required minimum SRM count rate prior to spiral reloading of the core; (2) add LCO and SR statements which incorporate requirements that are currently specified in DAEC procedures, and/or other TS sections and provide consistency with the General Electric (GE) Boiling Water Reactor (BWR) Standard Technical Specifications (STS), NUREG-0123, Revision 3; and (3) make administrative and minor editorial changes, including reorganization, page renumbering, and the denoting of defined terms, to clarify meaning and provide consistency with other DAEC TS sections, recently docketed TS submittals and the GE BWR STS.

2.0 EVALUATION

The evaluation of the requested TS changes was performed using the three categories outlined above.

SRM Fuel Assembly Loading Requirement

The DAEC TS 3.9 "Core Alterations" section specifies the LCO and SR items to be met during refueling operations. Current TS requirements state that, prior to the spiral reloading of the core, two diagonally adjacent fuel assemblies with exposure accumulated in the previous operating cycle must be reloaded into their former core positions next to each of the four SRMs. This is specified to establish the required minimum SRM count rate of 3 counts per second (cps). Since this fuel assembly configuration was known to be

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subcritical prior to removal from the core, it will be subcritical when reloaded in the core. This requirement is intended to ensure that an inadvertent criticality event does not occur before the required minimum SRM count rate is established. However, these previous core positions are, in general, not the required fuel locations of these assemblies for the next operating cycle. This leads to additional fuel handling (up to 16 moves) to establish the final fuel configuration.

Results of an analysis by General Electric, the current fuel vendor, were provided to DAEC, to demonstrate that an isolated two-by-two array loaded with two to four fuel assemblies will be subcritical. This analysis was performed using the GESTAR methodology, previously reviewed and approved by the staff. The GE analysis concluded that any uncontrolled, square two-by-two array of fuel assemblies will have a maximum K-effective of less than 0.95 at a moderator temperature of 20°C provided that:

- (1) 12 inches of water exists between the two-by-two array and any other surrounding fuel assemblies, and
- (2) their maximum reactivity corresponds to individual values of K-infinity not in excess of 1.31.

Condition 1 will exist when fuel assemblies are being initially loaded adjacent to each of the four SRMs and Condition 2 is a GE fuel design criterion currently required for both fresh and depleted fuel storage.

Additional Limiting Conditions for Operation and Surveillance Requirements

Current TS Section 3.9 contains the Surveillance Requirements for testing of the refueling interlock functions; however, there are no specific LCOs regarding the interlocks other than an Operability requirement. The testing conditions are currently specified by DAEC procedures and administrative controls.

The proposed TS LCO addition allows the reactor mode switch to be placed in the RUN, STARTUP/HOT STANDBY and SHUTDOWN positions to test the refueling interlock functions provided that:

- (1) control rods remain fully inserted in all core control cells which contain one or more fuel assemblies (except the rod being used to test the interlock), and
- (2) no other CORE ALTERATIONS are in progress.

The refueling control rod coupling/re-coupling requirement (TS 4.3.B.1.c) will be moved to the SR TS 4.9 section to be consistent with another recent TS revision request. Changes will also be made to current TSs 3.9.A.5 and 4.9.A.2 to clarify when the LCOs and SRs need to be "verified" versus "demonstrated" to be consistent with License Amendment 174.

The current TS LCOs allow either withdrawal of one or two control rods (TS 3.9.A.5) or multiple control rod withdrawal (TS 3.9.A.6). The proposed

changes regroup the LCOs into single and multiple control rod withdrawal specifications for clarity and consistency with the BWR STS 3/4.9.

An additional LCO is proposed to require that the LCOs for all core and containment cooling systems applicable to refueling (TS 3.5.G) be met whenever work is being performed that has the potential to drain the reactor vessel. This change is consistent with current DAEC procedures. Additional action statements are proposed to require that movement of irradiated fuel be suspended and that the integrity of the secondary containment be established if the spent fuel pool (SFP) water level falls below the required height of 36 feet. This is consistent with DAEC procedures and with current TS 3.5.G and 3.7.C.

Administrative and Editorial Changes

The current TS 1.0 Definition of CORE ALTERATIONS is proposed to be revised to clarify that routine replacement of incore detector strings that are not required to be operable does not constitute an alteration of the reactor core. A Definition of SHUTDOWN MARGIN is proposed to be added to be consistent with another recent TS revision request. Other minor editorial changes will also be made at the same time, including the use of capital letters to denote defined terms to improve clarity and for consistency with other TS submittals and the BWR STS formats.

The required surveillances for the grapple load switch settings will be relocated from the LCO Section 3.9 to the SR Section 4.9 for clarity and consistency with the STS. The TS 3/4.9 Bases section will be revised to reflect the LCO and SR changes. It is also proposed to revise the applicability statement, the references and the page numbering of TS 3.9 to improve clarity and reflect the revised subsections.

The staff has reviewed the licensee's submittal proposing changes to TS 3/4.9 to revise the requirements for loading fuel adjacent to SRMs prior to spiral reloading and to provide consistency with the GE Boiling Water Reactor Standard Technical Specifications (NUREG-0123) and with existing DAEC procedures. Based on the above safety evaluation, the staff concludes that the requested changes are supported by the licensee's analyses or clarify existing requirements. Therefore, the proposed changes are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Iowa State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 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 (56 FR 64654). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

5.0 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) 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: E. Kendrick

Date: August 25, 1992