

August 8, 1996

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Mr. Lee Liu  
 Chairman of the Board and  
 Chief Executive Officer  
 IES Utilities Inc.  
 Post Office Box 351  
 Cedar Rapids, IA 52406

SUBJECT: AMENDMENT NO. 216 TO FACILITY OPERATING LICENSE NO. DPR-49 - DUANE  
 ARNOLD ENERGY CENTER (TAC NO. M94131)

Dear Mr. Liu:

The Commission has issued the enclosed Amendment No. 216 to Facility Operating License No. DPR-49 for the Duane Arnold Energy Center. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated November 15, 1995, as supplemented on April 9, 1996.

The amendment revises the requirements for the End of Cycle Recirculation Pump Trip logic to match more closely the assumptions applicable to the turbine trip events for which it was installed. The surveillance requirements are also revised, based on those same assumptions.

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,

Original signed by:

Glenn B. Kelly, Project Manager  
 Project Directorate III-3  
 Division of Reactor Projects III/IV  
 Office of Nuclear Reactor Regulation

Docket No. 50-331

- Enclosures: 1. Amendment No. 216 to License No. DPR-49  
 2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

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Chairman of the Board and  
Chief Executive Officer  
IES Utilities Inc.  
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Sincerely,

A handwritten signature in cursive script that reads "Glenn B. Kelly".

Glenn B. Kelly, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-331

Enclosures: 1. Amendment No. 216 to  
License No. DPR-49  
2. Safety Evaluation

cc w/encls: See next page

Mr. Lee Liu  
IES Utilities Inc.

Duane Arnold Energy Center

cc:

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NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

IES UTILITIES INC.

CENTRAL IOWA POWER COOPERATIVE

CORN BELT POWER COOPERATIVE

DOCKET NO. 50-331

DUANE ARNOLD ENERGY CENTER

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 216  
License No. DPR-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by IES Utilities Inc., et al., dated November 15, 1994, as supplemented April 9, 1996, 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:

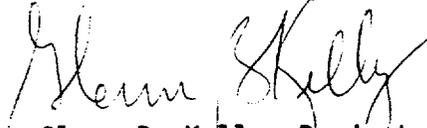
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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 216, 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



Glenn B. Kelly, Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of issuance: August 8, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 216

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 vertical lines.

| <u>Remove</u> | <u>Insert</u> |
|---------------|---------------|
| 3.2-34        | 3.2-34        |
| 3.2-35        | 3.2-35        |
| 3.2-36        | 3.2-36        |
| 3.2-47        | 3.2-47        |

LIMITING CONDITIONS FOR OPERATIONG. RECIRCULATION PUMP TRIP (RPT)  
AND ALTERNATE ROD INSERTION  
(ARI) INSTRUMENTATION

## 1. (ATWS) - RPT/ARI

The instrumentation that trips the recirculation pumps and initiates ARI as a means of limiting the consequences of a failure to scram during an anticipated transient shall be OPERABLE as shown in Table 3.2-G.

## (EOC)-RPT

The instrumentation that trips the recirculation pumps during stop valve or control valve fast closure for transient margin improvement at end-of-cycle\* shall be OPERABLE as shown in Table 3.2-G with the RPT SYSTEM TIME RESPONSE as shown in Table 4.2-G.

Applicability:

As shown in Table 3.2-G.

Action:

With one or more (ATWS)RPT/ARI or (EOC)-RPT instrument channels inoperable, take the ACTION required by Table 3.2-G.

SURVEILLANCE REQUIREMENTSG. RECIRCULATION PUMP TRIP (RPT)  
AND ALTERNATE ROD INSERTION  
(ARI) INSTRUMENTATION

1. Each RPT and ARI instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.2-G.
2. LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all ATWS-RPT/ARI instrumentation channels shall be performed at least once per operating cycle.
3. Time response testing of the RPT breakers shall be performed at least once per operating cycle.

**Table 3.2-G**  
**(ATWS) RPT/ARI AND EOC-RPT INSTRUMENTATION**

| TRIP FUNCTION                                   | TRIP LEVEL SETTING   | MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM | APPLICABLE OPERATING MODE | ACTION |
|---|--|---|---------------------------|--------|
| (ATWS) RPT/ARI<br>Reactor High Pressure         | ≤ 1140 psig  | 2 <sup>(a)(b)(c)</sup>                    | 1                         | 80     |
| (ATWS) RPT/ARI<br>Reactor Water Level-Low-Low   | ≥ +119.5 inches  | 2 <sup>(a)(b)(c)</sup>                    | 1                         | 80     |
| (EOC) RPT<br>Turbine Stop Valve Closure         | ≤ 10% Valve Closure  | 2 <sup>(b)(c)(d)</sup>                    | 1 <sup>(e)</sup>          | 81     |
| (EOC) RPT<br>Turbine Control Valve Fast Closure | within 30 milliseconds of the start of Control Valve Closure | 2 <sup>(b)(c)(d)</sup>                    | 1 <sup>(e)</sup>          | 81     |

- (a) There shall be one OPERABLE trip system for each parameter. If this cannot be met, the indicated ACTION shall be taken.
- (b) There are 2 trip systems. The instruments are arranged in a two-out-of-two once logic.
- (c) If an instrument(s) is (are) inoperable, it may be considered to be OPERABLE if placed in a tripped condition.
- (d) When an (EOC) RPT Channel is placed in inoperable status solely for the performance of required surveillance testing, the required actions may be delayed for up to 6 hours provided the trip capability for the associated trip function is maintained.
- (e) Both (EOC) RPT Systems required to be OPERABLE in Mode 1 with reactor power greater than or equal to 30% rated thermal power.

ACTION

- ACTION 80 - a. With one instrument channel inoperable, restore the inoperable instrument channel to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 24 hours.
- b. With both instrument channels inoperable, restore at least one instrument channel to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 24 hours.
- ACTION 81 - If one (EOC) RPT system is inoperable for more than 72 consecutive hours or if both (EOC) RPT systems are inoperable, apply the operating limit MCPR penalty specified in the COLR within 4 hours.

Table 4.2-G

(ATWS) RPT/ARI AND EOC-RPT INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| TRIP FUNCTION                                 | CHANNEL CHECK | CHANNEL FUNCTIONAL TEST | CHANNEL CALIBRATION | OPERATING MODES FOR WHICH SURVEILLANCE REQUIRED |
|---|---------------|-------------------------|---------------------|---|
| (ATWS) RPT/ARI<br>Reactor High Pressure       | NA            | A                       | A                   | 1   |
| (ATWS) RPT/ARI<br>Reactor Water Level-Low-Low | NA            | A                       | A                   | 1   |
| (EOC) RPT Logic                               | NA            | Q                       | NA <sup>##</sup>    | 1 <sup>***</sup>                                |
| RPT Breaker                                   | NA            | R                       | NA                  | #   |

END-OF-CYCLE (EOC) RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME

| TRIP FUNCTION                                   | RESPONSE TIME |
|---|---------------|
| RPT System (Turbine Control Valve Fast Closure) | ≤ 140 msec*   |
| RPT System (Turbine Stop Valve Closure)         | ≤ 120 msec**  |

- \* This response time is from energization of the fast acting solenoid to actuation of the RPT breaker secondary (auxiliary) contact.
- \*\* This response time is from actuation of the Turbine Stop Valve position switch to actuation of the RPT breaker secondary (auxiliary) contact.
- \*\*\* This surveillance is required only during those periods when the EOC (RPT) system is OPERABLE.
- # This surveillance is required to be performed during the Refuel Outage prior to the OPERATING CYCLE during which (EOC) RPT will be OPERABLE.
- ## Applicable Channel Calibrations performed per Table 4.1-1.

## DAEC-1

For each parameter monitored, as listed in Table 3.2.F, there are at least two (2) channels of instrumentation. By comparing readings between the two (2) channels, a near continuous surveillance of instrument performance is available. Any deviation in readings will initiate an early recalibration, thereby maintaining the quality of the instrument readings.

On July 26, 1984 the NRC published their final rule on Anticipated Transients Without Scram (ATWS), (10 CFR §50.62). This rule requires all BWR's to make certain plant modifications to mitigate the consequences of the unlikely occurrence of a failure to scram during an anticipated operational transient. The bases for these modifications are described in NEDE-31096-P-A, "Anticipated Transients Without Scram; Response to NRC ATWS Rule, 10 CFR 50.62," December 1985. The Standby Liquid Control System (SLCS) was modified for two-pump operation to provide the minimum required flow rate and boron concentration required by the ATWS rule (see section 3.4 Bases). The existing ATWS Recirculation Pump Trip (RPT) was modified from a one-out-of-two-once logic to trip each recirc. pump to a two-out-of-two-once logic to trip both recirc. pumps, ("Monticello" design). This logic will also initiate the Alternate Rod Insertion (ARI) system, which actuates solenoid valves that bleed the air off the scram air header, causing the control rods to insert. The instrument setpoints are chosen such that the normal reactor protection system (RPS) scram setpoints for reactor high pressure or low water level will be exceeded before the ATWS RPT/ARI setpoints are reached. Because ATWS is considered a very low probability event and is outside the normal design basis for the DAEC, the surveillance frequencies and LCO requirements are less stringent than for safety-related instrumentation.

The End-of-Cycle (EOC) recirculation pump trip was added to the plant to improve the operating margin to fuel thermal limits, in particular Minimum Critical Power Ratio (MCPR). The EOC-RPT trips the recirc. pumps to lessen the severity of the power increases caused by either a closure of turbine stop valves or fast closure of the turbine control valves with reactor power greater than or equal to 30% and a simultaneous failure of the turbine bypass valves to open. The operating limit MCPR in the Core Operating Limits Report (COLR) is calculated assuming an operable EOC-RPT system. If the requirements of Table 3.2-G are not met, then the operating limit MCPR penalty specified in the COLR shall be imposed to assure that the fuel thermal limits are not violated in the event of a turbine trip or load reject transient.

Should it be determined that accepting the calculated operating limit MCPR penalty is more desirable than operating with the (EOC)RPT in service, the (EOC)RPT may be bypassed. During the period when the (EOC)RPT is bypassed, the Surveillance Requirements need not be performed.

The accident monitoring instrumentation listed in Table 3.2-H were specifically added to comply with the requirements of NUREG-0737 and Generic Letter 83-36. The instrumentation listed is designed to provide plant status for accidents that exceed the design basis accidents discussed in Chapter 15 of the DAEC UFSAR.

Action 94 of Table 3.2-H deviates from the guidance of Generic Letter 83-36 as continued operation for 30 days (instead of 7 days as recommended in the generic letter) is allowed with one of two torus water level monitor (TWLM) channels inoperable. Redundancy is available in that at least one channel of



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 216 TO FACILITY OPERATING LICENSE NO. DPR-49

IES UTILITIES INC.

CENTRAL IOWA POWER COOPERATIVE

CORN BELT POWER COOPERATIVE

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 INTRODUCTION

In a letter dated November 15, 1995, IES Utilities Inc. (IES) proposed changes to the Technical Specifications (TSs) for the Duane Arnold Energy Center (DAEC)<sup>1</sup>. The proposed changes included revisions to the requirements for the End of Cycle (EOC) Recirculation Pump Trip (RPT) and related editorial changes.

After initial review of the above submittal, the NRC staff expressed concern with respect to the unclear wording in the revised TSs. In response to NRC staff concerns, the licensee submitted changes to the original submittal in a letter dated April 9, 1996<sup>2</sup>. The licensee rephrased the requirements to be more consistent with the Improved Technical Specifications (ITS), NUREG-1433, Revision 1.

2.0 EVALUATION

Revisions to Comments Clarifying Minimum Channels Operable

Currently, EOC RPT logic is indicated as a single trip function in TS Table 3.2-G, "(ATWS)RPT/ARI and EOC-RPT Instrumentation." This led to confusion with respect to the designation of the minimum operable channels per trip system and with table notes clarifying the system description and requirements. In response to NRC staff concerns, the licensee revised the table entry from the single trip function, EOC RPT logic, to two separate trip functions: EOC RPT Turbine Stop Valve (TSV) Closure and EOC RPT Turbine Control Valve (TCV) Fast Closure. In addition, the "Minimum Operable Channels per Trip System" was revised to recognize that there is a need to maintain two channels of each type of input (TSV closure and TCV fast closure) in order to satisfy the existing TS. The revised table representation is consistent with ITS, NUREG-1433, Revision 1. The staff concludes that these revisions provide a clear indication of the TS requirements and are acceptable.

The notes to TS Table 3.2-G were also changed. Note (a), which was originally referenced in the "Minimum Operable Channels per Trip System" column header, is now only applicable to the (ATWS)RPT/ARI Logic; therefore, references to Note (a) are relocated to the two trip functions applicable to (ATWS)RPT/ARI Logic. In the original submittal, the licensee used Note (d), with an associated "Insert," to clarify the EOC RPT trip system logic operability requirements, by describing the minimum operable channels required for the TSV closure and TCV fast closure. In response to the NRC concerns discussed above, the licensee decided to remove Note (d) and the associated "Insert" altogether to alleviate confusion. Note (d) was replaced with a new note to delay the required action under certain conditions. This change is reviewed in detail later in this SER. Also, Note (e) in TS Table 3.2-G was replaced with a note stating that both EOC RPT systems are required to be operable when the plant is in Mode 1 with reactor power greater than or equal to 30% rated thermal power. Note (e) clarifies the operability requirements for the EOC RPT systems and is consistent with ITS, NUREG-1433, Revision 1. Except for revised Note (d), the above editorial and technical changes are acceptable to the staff. The acceptability of the revised Note (d) is discussed further below.

Action 81 in TS Table 3.2-G was modified to reflect the existence of the proposed Operating Limit Minimum Critical Power Ratio (OLMCPR) penalty. The penalty is added onto the OLMCPR when the reactor is operating with the EOC RPT bypassed to ensure that the SLMCPR criterion is satisfied. The licensee proposes to put the OLMCPR into the Core Operating Limits Report (COLR) because its value will be cycle specific. The OLMCPR concept provides the same level of protection as the EOC RPT and is consistent with ITS, NUREG-1433, Revision 2. Therefore, the staff finds this change acceptable.

#### Revisions to AOT and STI for the EOC RPT

The licensee proposed to incorporate the extended surveillance test interval (STI) and allowable out-of-service time (AOT) for the EOC RPT instrumentation, in accordance with NRC-approved Licensing Topical Reports (LTRs) previously submitted by the Boiling Water Reactor Owner's Group (BWROG), of which IES is a member. On July 21, 1992, the NRC forwarded its safety evaluation (SE) on the review of General Electric (GE) topical report GENE-770-06-1, "Bases for Changes to STIs and AOTs for Selected Instrumentation Technical Specifications (TS)." The staff's review of GENE-770-06-1 concluded that the report provides a generally acceptable basis for extending STIs and AOTs for selected actuation instrumentation, including the EOC RPT instrumentation, for BWR4 and BWR6 plants. The instrumentation included in this report is either the same or similar instrumentation to that analyzed in previous analyses for reactor protection system (RPS), emergency core cooling system (ECCS), and isolation actuation instrumentation. The primary difference is the safety function performed by the different actuation instrumentation. The EOC RPT has common instrumentation with the RPS, but provides a different function than the RPS. This safety evaluation verifies that the TS changes to the AOT and STI proposed by the licensee for the EOC RPT and their associated justifications are bounded by the analyses provided in the approved topical report and that

the licensee has met all conditions stipulated by the staff in their SER approving the topical report.

To implement the extended STIs and AOTs for the selected instrumentation, the staff's SER for GENE-770-06-1 requires that the licensee do the following: 1) confirm the applicability of the generic analyses of GENE-770-06-1 to the plant, and 2) confirm that any increase in instrument drift due to the extended STIs is properly accounted for in the setpoint calculation methodology. In a previous submittal, the licensee confirmed the applicability of the generic analysis for NEDC 30851-P-A, "Technical Specification Improvement Analysis for BWR RPS," to the DAEC. In addition, in their telecon dated January 3, 1996, the licensee stated that the analysis of GENE-770-06-1 was applicable to DAEC. This is acceptable to the staff.

Instrument setpoint drift is monitored during channel calibration tests only. The proposed TS revision does not change the frequency of the channel calibration. The proposed change revises the STI of the channel functional test from monthly to quarterly. Since the channel calibration intervals are not affected by the proposed changes, instrument drift is not a factor and the RPS channel setpoint drift that could be expected under the proposed quarterly STIs for the channel functional test will remain within the existing allowance in the RPS instrument setpoint calculation. This is acceptable to the staff.

Based on the above, the findings of GENE-770-06-1 and the conclusions of the NRC staff's July 21, 1992, SER are applicable to the Duane Arnold Energy Center.

The licensee proposed to increase the channel functional test STI specified in TS Table 4.2-G, "(ATWS)RPT/ARI and EOC-RPT Instrumentation Surveillance Requirements," from monthly (M) to quarterly (Q) for the EOC RPT logic. The revision of the STI as described is consistent with the staff's July 21, 1992, SER and therefore, is acceptable.

The licensee proposed to modify Note (d) of TS Table 3.2-G, "(ATWS)RPT/ARI and EOC-RPT Instrumentation," to clarify the conditions under which delaying a required action is allowed and to reflect an extended AOT of 6 hours. The revised note indicates that a required action may be delayed up to 6 hours when an EOC RPT channel is placed in an inoperable status solely for the performance of required surveillance testing, provided that the trip capability for the associated trip function is maintained. This revised wording is consistent with the ITS, NUREG-1433, Revision 1. The proposed change to extend the AOT is in accordance with the staff's July 21, 1992, SER and therefore, is acceptable.

#### Revisions to Acceptance Criteria for EOC RPT Response Time Testing

By design, the EOC RPT is assumed to interrupt power to the recirculation pump motor within 175 milliseconds after initiation of either TSV closure or TCV fast closure. The response time test measures only a portion of the complete trip, and the remaining portion is measured as a part of start-up testing. Also, time measured is dependent on which trip input is being measured.

The licensee proposed to revise the response time test acceptance criteria as specified in TS Table 4.2-G, "(ATWS)RPT/ARI and EOC-RPT Instrumentation Surveillance Requirements - End-of-Cycle (EOC) Recirculation Pump Trip System Response Time," for the EOC RPT system and to clarify the method of measuring that response time. The DAEC TS currently indicates a single response time of  $\leq 140$  msec for the RPT System Trip Function, which is measured from the initiation of the TCV fast closure or the TSV closure to the actuation of the RPT breaker secondary (auxiliary) contact. The licensee proposed to change the single trip function designation, RPT system, to two separate trip functions: RPT System TSV Closure and RPT System TCV Fast Closure. This is consistent with the changes made to TS Table 3.2-G. By separating the trip function in this manner, the licensee can delineate between the differences in response times when testing the input produced by the TSVs or TCVs.

Turbine stop valve closure is sensed by a position switch, which is set to initiate EOC RPT logic at 10% valve closed. A brief delay exists between the beginning of valve motion and initiation of the EOC RPT logic. The licensee proposed a response time of  $\leq 120$  msec for the TSV closure. The licensee also proposed to add Note (\*\*\*) to TS Table 4.2-G to clarify that this response time is "measured from the actuation of the TSV position switch to the actuation of the RPT breaker secondary (auxiliary) contact." On the other hand, TCV fast closure is sensed by a pressure switch that monitors the hydraulic fluid controlling the valve. Therefore, there is no measurable delay between valve motion and the initiation of the EOC RPT logic. The licensee proposed a response time of  $\leq 140$  msec for the TCV fast closure. The licensee also proposed to add Note (\*) to Table 4.2-G to clarify that this response time is "measured from the energization of the fast acting solenoid to actuation of the RPT breaker secondary (auxiliary) contact."

The licensee added notes relating to the EOC RPT Logic surveillances. Note (\*\*\*) states that the surveillance is required only during periods when the EOC RPT trip function is operable. Also, Note (#) requires that the surveillance be performed during the refueling outage prior to the operating cycle during which the EOC RPT will be operable. These notes are acceptable.

The proposed response times account for the differences in instrumentation and are still within the allowable time period. Therefore, these proposed response times are acceptable to the staff. The licensee is not changing the testing methodology. In actuality, the proposed changes to the table are just providing clarifications to reflect the actual testing practices. Both the editorial and technical changes proposed are acceptable to the staff.

#### Editorial and Bases Changes

Changes were proposed for Note (##) in TS Table 4.4-1 and two pages of the DAEC TS; page 3.2-34 and 3.2-47. The change to Note (##) in TS Table 4.1-1 provides an appropriate reference to another table and is, therefore, acceptable. The change to page 3.2-34 is editorial in nature and is acceptable. Change 3.2-47 modifies the TS bases for the OLMCPR and how it is applied. This change is also acceptable.

## Conclusions

The staff has reviewed the Technical Specification changes proposed by IES for the Duane Arnold Energy Center relating to the End-of-Cycle Recirculation Pump Trip. The staff concludes that 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 changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes 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 effluent 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 the amendment involves no significant hazards consideration and there has been no public comment on such finding (61 FR 1629). Accordingly, the 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 the 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 Contributors: T. Ulses  
S. Wittenberg

Date: August 8, 1996

## REFERENCES

1. Letter from John F. Franz (IES) to William T. Russell (NRC) requesting changes to the DAEC TS for the EOC RPT, November 15, 1995.
2. Letter from John F. Franz (IES) to William T. Russell (NRC) modifying November 15, 1995 submittal regarding EOC RPT, April 9, 1996.