

10 CFR 50.59
10 CFR 50.90

June 21, 2002
NG-02-0314

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
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-050A)
“Proposed Changes to DAEC Technical Specifications Section 5.0,
Administrative Controls”

Reference: NG-02-0110, Technical Specification Change Request (TSCR-050):
“Proposed Changes to DAEC Technical Specifications Section 5.0,
Administrative Controls”, dated February 8, 2002

File: A-117

Dear Sir(s):

The referenced letter submitted a request to revise Section 5.0 of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). This submittal makes a minor revision to that original request and provides some additional information requested informally by your staff.

The original application for amendment to the DAEC TS proposed incorporation of portions of approved Technical Specifications Task Force (TSTF) item TSTF-258 Revision 4 into the DAEC TS. As pointed out by the Staff, our original change request misinterpreted the TSTF in proposing to delete DAEC TS 5.2.2.a. We agree that this was an oversight and that this section should remain in the DAEC TS. Therefore, the original submittal is being revised to reflect this change, as well as other minor editorial changes. Only those affected parts of the referenced submittal are attached and are annotated with revision bars to denote the changes with the exception of the two attached TS pages.

Also, the Staff requested a copy of our letter NG-97-1798, which was referenced in the original change request. This letter included, among other things, justification for not

incorporating Insert G of TSTF-258 regarding plant manager independent audit of overtime records. That reference, with the pertinent attachment extracted, is attached. In addition, a copy of NG-98-0127 is also attached, with an excerpt from its attachments that provides further information on this item.

The following commitment is hereby withdrawn:

In License Amendment #96, DAEC committed to the annual reporting of challenges to safety/relief valves in accordance with NUREG 0737, Item 0737 II.K.3.3. This reporting requirement was subsequently revised to be included in the monthly operating report in License Amendment #223. This amendment request (TSCR-050A) will delete this reporting requirement; thus, withdrawing our previous commitment to NUREG 0737, Item II.K.3.3.

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

Nuclear Management Company, LLC

By Rob Anderson for
Mark A. Peifer
DAEC Site Vice-President

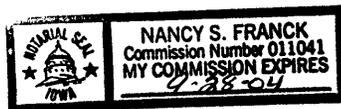
State of Iowa
(County) of Linn

Signed and sworn before me on this 21st day of June, 2002

By Rob Anderson

Notary Public in and for the State of Iowa

Nancy S Franck



Commis ion A rectangular notary seal stamp for Nancy S. Franck, identical to the one above, placed over the word "Commission" in the text.

June 21, 2002
NG-02-0314
Page 3 of 3

Attachments:

1. Evaluation of Change Pursuant to 10 CFR Section 50.92
2. PROPOSED CHANGE TSCR-050A TO THE DUANE ARNOLD ENERGY CENTER TECHNICAL SPECIFICATIONS
3. SAFETY ASSESSMENT
4. NG-97-1798 (Excerpt)
5. NG-98-0127 (Excerpt)

CC: C. Bleau (w/a)
R. Anderson (NMC) (w/o)
D. Hood (NRC-NRR) (w/a)
J. Dyer (NRC-Region III) (w/a)
D. McGhee (State of Iowa) (w/a)
NRC Resident Office (w/a)
Documaster

Evaluation of Change Pursuant to 10 CFR Section 50.92Background:

This proposed amendment incorporates Technical Specification Task Force (TSTF) Item TSTF-258, Revision 4, into Technical Specifications (TS) Section 5.0.

Nuclear Management Company, LLC Docket No: 50-331

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Requests: February 8 and June 21, 2002

Description of Amendment Request:

The proposed amendment requests make several changes to TS Section 5.0, Administrative Controls. Revisions are made to delete requirements for the Shift Technical Advisor (STA) as a separate position while retaining the function. Section 5.5.4, Radioactive Effluent Controls Program, is revised to be consistent with the intent of 10 CFR 20. Section 5.6.4, Monthly Operating Reports, is revised by deleting periodic reporting requirements for main steam safety/relief valve challenges to be consistent with Generic Letter 97-02. Section 5.7, High Radiation Area, is revised in accordance with 10 CFR 20.1601(c).

Exceptions to the TSTF:

Changes in TS section 5.2.2 related to working hour limits (TSTF Insert A), unit staff qualifications (TSTF Insert B), and some changes in section 5.5.4 related to effluents (TSTF Insert C) have already been incorporated into the existing Duane Arnold Energy Center (DAEC) TS, and therefore are not part of this submittal. Insert "G" of the TSTF to section 5.2.2 regarding the independent review of working hours has also not been included. The insert states: "Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned." Justification for not including such a review was previously provided during the conversion to Improved Technical Specifications in DAEC letter NG-97-1798, dated October 16, 1997. Additional justification was also provided in DAEC letter NG-98-0127, dated January 23, 1998. Existing DAEC procedural requirements ensure that each overtime deviation is reviewed and approved to assure restrictions on excessive work hours are met. Each employee and supervisor is required to maintain cognizance of fatigue, effectiveness, and fitness for duty when considering overtime approval. The Nuclear Oversight Department performs audits of approved overtime deviations during and after refueling outages, when overtime is most utilized. The amount of salaried and non-salaried overtime is a Nuclear Management Company (NMC), LLC performance indicator that receives significant plant management attention on a monthly basis.

Basis for proposed No Significant Hazards Consideration:

The Commission has provided standard 10 CFR Section 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if the change

would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

After reviewing this proposed amendment, NMC has concluded that no significant hazards exist for the following reasons:

- 1) The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This request for amendment to Duane Arnold Energy Center's TS provides for adoption of the NRC-approved generic change TSTF item TSTF-258, Revision 4. The Amendment request includes revisions to TS Section 5.0, "Administrative Controls," to delete requirements for the STA as a separate position while retaining the function, revise the Radioactive Effluent Controls Program to be consistent with the intent of 10 CFR 20, delete periodic reporting requirements of challenges to main steam safety/relief valves, and revise radiological control requirements for radiation areas to be consistent with those specified in 10 CFR 20.1601(c).

The proposed TS changes are administrative in nature and do not impact the operation, physical configuration, or function of plant equipment or systems. The changes do not impact the initiators or assumptions of analyzed events, nor do they impact mitigation of accidents or transient events. Therefore, these proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes are administrative in nature and do not alter plant configuration, require that new equipment be installed, alter assumptions made about accidents previously evaluated or impact the operation or function of plant equipment or systems. The proposed changes do not introduce any new modes of plant operation or make any changes to system setpoints. The proposed changes do not create the possibility of a new or different kind of accident due to credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated has not been created.

- 3) The proposed amendment will not involve a significant reduction in a margin of safety.

The proposed TS changes are administrative in nature and do not involve physical changes to plant structures, systems, or components (SSCs), or the manner in which these SSCs are operated, maintained, modified, tested, or inspected. The proposed changes do not involve a change to any safety limits, limiting safety system settings, limiting conditions for operation, or design parameters for any SSC. The proposed changes do not impact any safety analysis assumptions and do not involve a change in initial conditions, system response times, or other parameters affecting any accident analysis. Regarding the deletion of the requirement for the STA as a separate position, the function will be retained, so there will be no reduction in the margin of safety. As a result, there is no significant reduction in a margin of safety.

Based on the above, we have determined that the proposed amendment will not involve a significant hazards consideration.

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401.

Attorney for Licensee: Al Gutterman, Morgan Lewis, 1111 Pennsylvania Avenue, NW, Washington, D.C. 20004.

PROPOSED CHANGE TSCR-050A TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend the Technical Specifications by deleting the referenced pages and replacing them with the enclosed new pages. Following this page are the marked-up pages for this change.

SUMMARY OF CHANGES:

<u>Page</u>	<u>Description of Changes</u>
5.0-3	(This change is withdrawn per TSCR-050A.)
5.0-4	Remove specific references to the STA as a position
5.0-10	Revise section 5.5.4 to be consistent with 10 CFR 20
5.0-20	In Section 5.6.4 delete the requirement to include documentation of all challenges to the safety/relief valves in the Monthly Operating Reports.
5.0-22 & 5.0-23	Replace entire section 5.7, "High Radiation Area," with new one that is in accordance with 10 CFR 20.1601(c)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall also include the following:

~~a. A non-licensed operator shall be assigned to the reactor when containing fuel and an additional non-licensed operator shall be assigned to the reactor when operating in MODES 1, 2, or 3.~~

Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m).

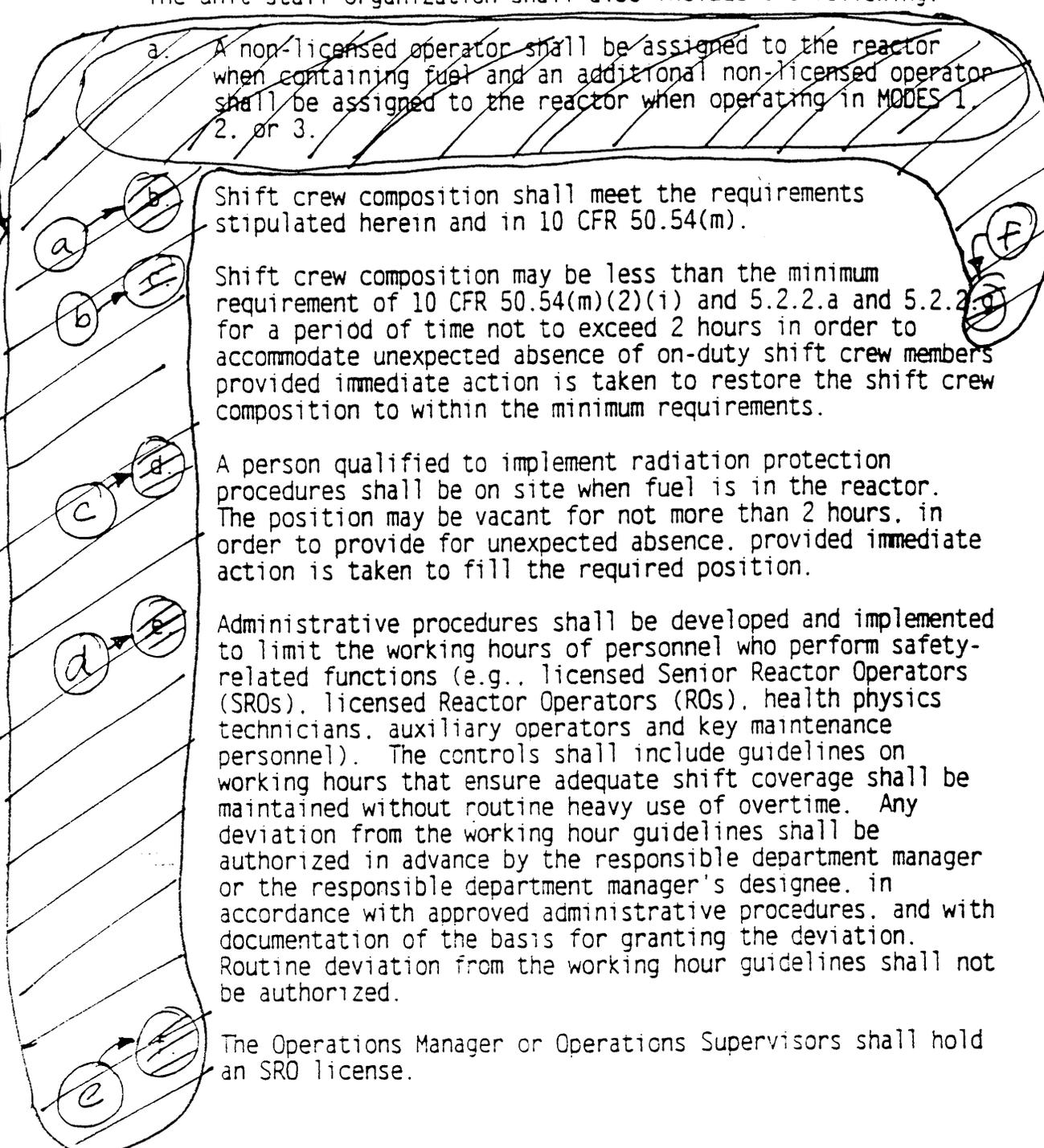
Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.c for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

A person qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physics technicians, auxiliary operators and key maintenance personnel). The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the working hour guidelines shall be authorized in advance by the responsible department manager or the responsible department manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

The Operations Manager or Operations Supervisors shall hold an SRO license.

This change is being withdrawn per TSCR-050A



(continued)

5.2 Organization

5.2.2 Unit Staff (continued) *An individual*

g. *Unit Operations* ~~The Shift Technical Advisor (STA)~~ shall provide advisory technical support to the shift ~~manager~~ *crew* in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. ~~In addition, the STA or the individual filling the STA position~~ shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. ~~The STA~~ function is not required in MODES 4 and 5. *This*

TSCR-OSDA *This* ^

SAFETY ASSESSMENT

Introduction:

By letters dated February 8, 2002 and June 21, 2002, Nuclear Management Company, LLC (NMC) submitted a request for revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed amendment requests revision of the administrative section of the TS per Technical Specification Task Force (TSTF), Item TSTF-258, Revision 4, titled "Changes to Section 5.0, Administrative Controls."

Background:

As part of a continuing effort to maintain and improve the use of TS, the industry and the Nuclear Regulatory Commission (NRC) staff have worked to develop generic changes to the Improved Standard Technical Specifications (ISTTs) (NUREGs 1430 through 1434). This process saves licensee and industry resources by addressing generic issues once, rather than on each plant docket, and by pre-identifying the information necessary to process the change. This improves the adoption process for generically acceptable changes.

Generic changes to the ISTTs NUREGs are proposed by the Nuclear Energy Institute (NEI) TSTF to the NRC. The TSTF includes representatives from the four U.S. commercial nuclear power plant Owners Groups, and NEI. Generic changes are prepared and reviewed using a process that the TSTF and the NRC developed to correct and improve the ISTTs NUREGs. These proposed changes are assigned a number for tracking purposes, and are referred to as TSTFs (e.g., TSTF-2, TSTF-5, etc.). After NRC approval, these TSTFs are available for adoption by plants. TSTF-258, Revision 4, "Changes to Section 5.0, Administrative Controls," has been approved by the NRC. Periodically the NRC issues revisions to the ISTTs NUREGs which incorporate the approved TSTFs. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 2, incorporates TSTF-258, Revision 4. This is the ISTTs NUREG that currently applies to DAEC.

Evaluation:

The changes in TSTF-258 that DAEC proposes to adopt are to revise TS Section 5.0, "Administrative Controls", in four areas. The proposed changes include the following:

1. In section 5.2.2, replace the specific "Shift Technical Advisor (STA)" title with "individual,"
2. Minor editorial changes to section 5.5.4 to be consistent with the intent of 10 CFR 20, and specify that the provisions of Surveillance Requirements (SR) 3.0.2 and 3.0.3 are applicable to the Radioactive Effluent Controls Program,
3. Revise section 5.6.4 to remove the requirement to document safety/relief valve challenges in the Monthly Operating Reports,

4. Revise section 5.7 in accordance with 10 CFR 20.1601(c), update the acceptable alternate controls to those given in 10 CFR 20.1601(c), and reformat the section to improve readability.

Changes in TS section 5.2.2 related to working hour limits (TSTF Insert A), unit staff qualifications (TSTF Insert B), and some changes in section 5.5.4 related to effluents (TSTF Insert C) have already been incorporated into the existing DAEC TS, and therefore are not part of this submittal. Insert "G" of the TSTF to section 5.2.2 regarding the independent review of working hours has also not been included. The insert states: "Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned." Justification for not including such a review was previously provided during the conversion to Improved Technical Specifications in DAEC letter NG-97-1798, dated October 16, 1997. Additional justification was also provided in DAEC letter NG-98-0127, dated January 23, 1998. Existing DAEC procedural requirements ensure that each overtime deviation is reviewed and approved to assure restrictions regarding excessive work hours are met. Each employee and supervisor is required to maintain cognizance of fatigue, effectiveness, and fitness for duty when considering overtime approval. The Nuclear Oversight Department performs audits of approved overtime deviations during and after refueling outages, when overtime is most utilized. The amount of salaried and non-salaried overtime is an NMC performance indicator that receives significant plant management attention on a monthly basis.

Basis for change:

The title "STA" is replaced with the term "individual" in the NRC-approved TSTF so that it is not implied that the STA and the Shift Supervisor must be different individuals. Option 1 of the Commission Policy Statement on Engineering Expertise on Shift can be satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the Senior Reactor Operators (SROs) required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift. The existing wording could be easily misinterpreted to require separate individuals. Therefore, the wording is revised so that the STA function may be provided by either a separate individual or the individual who also fulfills another role in the shift command structure. The revised wording is consistent with NUREG-1433, Revision 2.

TS 5.5.4 on the Radioactive Effluent Controls Program is being modified to be consistent with the revision to 10 CFR 20. The DAEC TS have previously incorporated the TSTF changes to limitations on the dose rate resulting from radioactive material released in liquid and gaseous effluents to areas at or beyond the site boundary, except for minor wording changes which are administrative changes. In addition, the provisions of Surveillance Requirement (SR) 3.0.2 are applied to the Radioactive Effluent Controls Program surveillance frequencies to allow for scheduling flexibility. SR 3.0.2 permits a 25 percent extension of the interval specified in the frequency (31 days). Allowing a 25 percent extension in the frequency of performing the monthly cumulative dose and

projected dose calculation for the current quarter/year will have no effect on the outcome of the calculations. SR 3.0.3 is added in association with SR 3.0.2 to maintain consistency of the TS application.

For TS 5.6.4, Monthly Operating Reports, the NRC-approved TSTF indicates that information on safety/relief valve challenges is not required for the NRC Performance Indicator Program and therefore does not need to be reported in the Monthly Operating Reports.

TS Section 5.7, High Radiation Area, is revised in accordance with 10 CFR 20.1601(c) and is updated with acceptable alternate controls to those provided in 10 CFR 20.1601.

Summary:

Therefore, based on the above, NMC has concluded that the proposed revision to the DAEC TS is acceptable.

Attachment 4 to NG-02-0314

NG-97-1798 (Excerpt), dated October 16, 1997

Response to NRC Requests for Additional Information on the DAEC Improved
Technical Specifications



Duane Arnold Energy Center
11770-250 Road
P.O. Box 6000
Reynolds, Oregon 97139
Full City 503-751-7111

October 16, 1997

NG-97-1798

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center

- Docket No: 50-331

Op. License No: DPR-49

Response to NRC Requests for Additional Information on the DAEC Improved
Technical Specifications

- References:
- 1) J. Franz (IES) to F. Miraglia (NRC), "Submittal of License Amendment Request to Convert the DAEC Technical Specifications to the Improved Technical Specifications (NUREG-1433), (RTS-291)," NG-96-2322, October 30, 1996.
 - 2) Letter, G. Kelly (NRC) to L. Liu (IES), dated August 18, 1997, "Request for Additional Information on the DAEC Improved Specifications (TAC No. M97197)."
 - 3) Letter, G. Kelly (NRC) to L. Liu (IES), dated September 8, 1997. "Request for Additional Information (RAI) on the DAEC Improved Technical Specifications (ITS) (TAC No. M97197)."
 - 4) Letter, G. Kelly (NRC) to L. Liu (IES), dated October 8, 1997, "Request for Additional Information on the DAEC Improved Technical Specifications (ITS) (TAC No. M97197)."
 - 5) Letter, K. Peveler (IES) to U.S. NRC, "Partial Response to NRC Request for Additional Information," NG-97-1598, September 17, 1997.
 - 6) Letter, K. Peveler (IES) to U.S. NRC, "Response to NRC Request for Additional Information on DAEC Improved Technical Specifications," NG-97-1723, September 30, 1997.

File: A-117, SPF-167

Dear Sir(s):

In Reference 1, IES Utilities docketed a request to convert the DAEC Technical Specifications to the Standard Technical Specifications (NUREG-1433). In References 2, 3 and 4, the NRC transmitted Requests for Additional Information (RAI) on selected sections of the Reference 1 submittal. The first enclosure to this letter contains our Responses to a number of those Questions. This is not a complete response to the Referenced RAIs, per our Reference 4 agreement.

Similar to the previous submittal (Ref. 6), revisions to the Discussion of Changes (DOCs), Justification for Deviations (JFDs) and No Significant Hazards Considerations (NSHC) have been annotated with revision bars and the NRC Question number. All the DOC, JFD and NSHC pages in the affected Section have been replaced with new pages that are marked as Revision B, to distinguish these changes from those made in the previous submittal.

In Reference 6, we provided the Staff with a summary matrix showing the proposed final destination of those items categorized as "Relocated Items" in the original submittal (Ref. 1). As a number of our Responses in Enclosure 1 to this letter reference that matrix, we have enclosed another copy for the Staff's convenience. No changes to that matrix have been made.

As documented in the first enclosure to this letter, Responses to all of the Staff's questions in Chapters/Sections 1.0, 3.1, 3.4, and 5.0 have been made. In addition, Chapters/Sections 2.0, 3.0, 3.2, 3.5, 3.7, 3.9, 3.10, and 4.0 were closed out by our previous submittals (References 5 and 6). We are ready to meet with the Staff, at mutual convenience, to discuss these closed-out Chapters/Sections.

The Responses to the remaining Sections (3.3, 3.6, and 3.8) are under development, as are the revisions to the ITS and Bases, and will be submitted in the near future.

No new commitments are made in this letter.

Sincerely,



Kenneth E. Peveler
Manager, Regulatory Performance

Enclosures: 1) IES Responses to NRC Questions on the DAEC ITS Conversion
2) Relocated Items Matrix for the DAEC Improved Technical Specifications

October 16, 1997

NG-97-1798

Page 3 of 3

cc: K. Putnam

L. Root *

J. Franz *

D. Wilson *

G. Kelly (NRC-NRR)

A. B. Beach (Region III)

NRC Resident Office

* w/o Enclosures

DAEC ITS 5.0 ADMINISTRATIVE CONTROLS

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	R.3		<p>CTS 6.11.2 includes the requirements for the Core Operating Limits Report (COLR). In the CTS the COLR requires establishing core limits for Linear Heat Generation Rate (LHGR). ITS 5.6.5 does not include this requirement. Justification for this change to CTS requirements is based on a letter from A.C. Thandani (NRC) to J.S. Carnley (GE), "Acceptance for Referencing of Amendment 19 to General Electric Licensing Topical Report NEDE-24011-P-A (GESTAR-II), General Electric Standard Application for Reactor Fuel," dated april 7,1987.</p>	<p>Acceptance of this change to CTS requirements is contingent upon the applicability of the letter from A.C. Thandani (NRC) to J.S. Carnley (GE), "Acceptance for Referencing of Amendment 19 to General Electric Licensing Topical Report NEDE-24011-P-A (GESTAR-II), General Electric Standard Application for Reactor Fuel," dated april 7,1987, to the DAEC submittal. Provide a discussion of the applicability of this change to DAEC.</p>	
<p>DAEC RESPONSE: General Electric is the sole supplier of fuel for the DAEC. NEDE-24011-P-1 (GESTAR-II) is the licensing topical report for that fuel and this is applicable to the DAEC (reference UFSAR section 4.3). As stated in DOC R3, Amendment 19 to NEDE-240-11-P-A requires that LHGR continue to be monitored by the plant process computer as a condition for eliminating LHGR as a TS thermal limit. The DAEC will continue to monitor LHGR, as required by Amendment 19 to NEDE-24011-P-A. Therefore, this Amendment to NEDE-24011-P-A is applicable to DAEC.</p>					
2		P-26	<p>STS 5.2.2.e requires the amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (generic Letter 82-12).</p>	<p>Review the NRC letter from C. I. Grimes to J. Davis of NEI, of April 9, 1997, addressing appropriate overtime control requirements; and adopt.</p>	
<p>DAEC RESPONSE: The suggested changes in the April 9 letter will be adopted with the following exceptions: generic position titles will be used (e.g., "responsible department manager"), consistent with TSTF-65 and the requirement for the monthly review will not be adopted, as it is not consistent with the DAEC's current licensing basis and commitments to GL 82-12.</p>					
3	R.9		<p>CTS 6.8.2 includes the details of the review and approval process and CTS 6.8.3 includes details for the temporary change process for procedures. The ITS does not include these details. The details are moved outside the ITS to unspecified plant procedures.</p>	<p>The details of the review and approval process and the details for the temporary change process shall be relocated to the QAP. The revised QAP shall be submitted to the NRC for review, prior to the issuance of the final NRC SE.</p>	
<p>DAEC RESPONSE: These details will be included in the Quality Assurance Plan (QAP). The revised QAP has been submitted to the NRC. (Letter NG-97-1348 dated September 25, 1997).</p>					

Attachment 5 to NG-02-0314

NG-98-0127 (Excerpt), dated January 23, 1998

Request for Technical Specification Change (RTS-291): Revision C to the DAEC
Improved Technical Specifications



IES Utilities Inc.
200 First Street S.E.
P.O. Box 351
Cedar Rapids, IA 52406-0351
Telephone 319 398 8162
Fax 319 398 8192

John F. Franz, Jr.
Vice President, Nuclear

January 23, 1998
NG-98-0127

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Request for Technical Specification Change (RTS-291): Revision C to the
Duane Arnold Energy Center Improved Technical Specifications.

References: 1) J. Franz (IES) to F. Miraglia (NRC), "Submittal of License Amendment
Request to Convert the DAEC Technical Specifications to the
Improved Technical Specifications (NUREG-1433), (RTS-291)," NG-
96-2322, October 30, 1996.
2) Letter, K. Peveler (IES) to U.S. NRC, "Partial Response to NRC
Request for Additional Information," NG-97-1598, September 17,
1997.

File: A-117, SPF-167

Dear Sir(s):

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90,
IES Utilities Inc. hereby requests revision to the Technical Specifications (TS) for the
Duane Arnold Energy Center (DAEC).

In the Reference 1 letter, IES Utilities submitted its request to convert the existing DAEC TS to the Improved Technical Specifications (ITS), based upon NUREG-1433. We hereby request to amend that application with the enclosed revision (Enclosure 1). Attachment 1 to this letter contains a summary listing of the changes by affected ITS Section and identifies the source of the change (i.e., IES, NRC or Generic Traveler). As the DAEC tracks changes to the ITS submittal by Comment Resolution Form (CRF) number, the pages of Enclosure 1 are annotated with the corresponding CRF numbers, which are included in the Attachment 1 summary.

Per the Reference 2 agreement, only the marked-up pages for ITS Rev. A showing the changes for Rev. C are included in Enclosure 1. New clean, typed pages will be submitted to the Staff after all of our responses to the Staff's Requests for Additional Information (RAIs) on the submittal have been closed. Any necessary revisions to the previously-submitted justifications (i.e., Discussions of Change (DOCs), Justifications for Deviation (JFDs) or No Significant Hazards Considerations (NSHCs) and marked-up pages to the Current TS (CTS)) also are included. For ITS Sections 3.3, 3.6, and 3.8, we have included all the pages in these sections for the DOCs, JFDs and NSHCs; however, for the other affected Sections included in Rev. C (Sections 1.0, 3.4, and 5.0), we have only included the pages with the revised DOC, JFD or NSHC. Per our convention, we have included replacements only for the affected pages for the mark-ups of the CTS and ITS pages.

In our previous ITS submittals, we provided the Staff with a summary matrix showing the proposed final destination of those items categorized as "Relocated Items" in the original submittal (Reference 1). As a number of our revisions in Enclosure 1 to this letter affect that matrix, we have enclosed an updated copy for the Staff's convenience (Enclosure 2).

This application has been reviewed by the DAEC Operations Committee and the Safety Committee. 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.

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

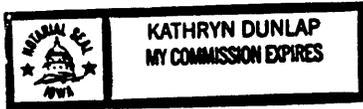
IES UTILITIES INC.

By John Franz
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 23 day of January, 1998,

by John F. Franz.



Kathryn Dunlap
Notary Public in and for the State of Iowa

July 24, 1999
Commission Expires

Attachment: Summary Listing for Revision C to the DAEC ITS

Enclosures: 1) Revision C to the DAEC ITS
2) Relocated Items Matrix for the DAEC Improved Technical Specifications

JFF/RAB/rab

cc: R. Browning
L. Root (w/o attachment)
G. Kelly (NRC-NRR)
A. B. Beach (Region III)
P. Baig (State of Iowa)
NRC Resident Office
DOCU

DISCUSSION OF CHANGES TO NUREG-1433
CHAPTER 5.0 -- ADMINISTRATIVE CONTROLS

PLANT SPECIFIC CHANGES (continued)

- P₂₄ This bracketed item was deleted because it is not applicable to the DAEC specific requirements. This change also includes the deletion of Reviewers Notes, as applicable.
- P₂₅ The ITS has been revised to remove specific job titles and replace them with more generic titles. These plant specific job titles will be documented in the UFSAR or QA Plan. These changes are consistent with TSTF-65.
- P₂₆ NUREG 5.5.2.e has been revised such that overtime for unit personnel performing safety related work will be controlled in accordance with administrative procedures. This is consistent with DAEC commitments to GL 82-12, current licensing basis and the NRC Memo from C. I. Grimes to J. Davis, dated April 9, 1997. Generic titles for personnel have been used in accordance with TSTF-65. The monthly overtime review by the [Plant Superintendent] recommended by the NRC Memo has not been added in the interests of minimizing the addition of new responsibilities and work burden on the DAEC Plant Manager. Periodic audits of overtime by personnel and their managers are sufficient without necessitating an upper level management audit. {5.0-2}
- P₂₇ The NUREG is being changed consistent with the DAEC Request for Technical Specification Change (RTS-269) dated December 22, 1995. RTS-269 implements 10 CFR 50 Appendix J, Option B requirements. Changes to the RTS-269 submittal were made to reflect ITS SR 3.0.2 and SR 3.0.3 provisions.
- P₂₈ NUREG 5.2.2.d is changed to implement the intent of CTS 6.2.2.2.e that a person qualified to implement radiation protection procedures be available, not necessarily limited to a Health Physics Technician.
- P₂₉ NUREG 5.5.4, Radioactive Effluent Controls Program and NUREG 5.7, High Radiation Area have been changed to be consistent with those in the draft NRC Generic Letter on Technical Specification changes to reflect the revisions to 10 CFR 20. Minor editorial changes to the guidance provided in the draft NRC Generic Letter were made for consistency with plant specific terminology or for clarity.
- P₃₀ Typographical/grammatical error corrected or the Specification has been renumbered to be consistent with the ITS format and for clarity.