



October 29, 2004

NG-04-0689
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Duane Arnold Energy Center
Docket 50-331
License No. DPR-49

Application for Technical Specification Improvement to Revise the Required Action Within TS 3.1.8 "Scram Discharge Volume (SDV) Vent and Drain Valves," Using the Consolidated Line Item Improvement Process

Pursuant to 10 CFR 50.90, Nuclear Management Company, LLC (NMC), hereby requests an amendment to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

The proposed amendment would revise the required action within TS 3.1.8 "Scram Discharge Volume (SDV) Vent and Drain Valves" for the condition of having one or more SDV vent or drain lines with one valve inoperable. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-404, "Scram Discharge Volume Vent and Drain Lines." The availability of this technical specification improvement was noticed in the *Federal Register* on April 15, 2003 as part of the consolidated line item improvement process (CLIP).

Enclosure I provides a description and assessment of the proposed change and confirmation of applicability. Enclosure II provides the existing TS pages marked-up to show the proposed change. Enclosure III provides revised, clean TS pages. Changes to the TS Bases will be provided in a future update in accordance with the Bases Control Program.

NMC requests approval of the proposed license amendment by March 2005, with the amendment being implemented within 90 days.

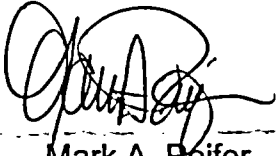
This letter makes no new commitments or changes to any existing commitments.

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In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to DAEC's designated State Official.

If you should have any questions regarding this submittal, please contact Robert Murrell (319-851-7900).

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 29, 2004.



Mark A. Peifer
Site Vice President, Duane Arnold Energy Center
Nuclear Management Company, LLC

Enclosures (3)

cc: Regional Administrator, Region III, USNRC
Project Manager - NRR, DAEC
NRC Resident Inspector, DAEC
State of Iowa - D. McGhee

ENCLOSURE I

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment revises the required action within Technical Specification (TS) 3.1.8 "Scram Discharge Volume (SDV) Vent and Drain Valves" for the condition of having one or more SDV vent or drain lines with one valve inoperable.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change Traveler, TSTF-404, "Scram Discharge Volume Vent and Drain Lines," that has been approved generically for the BWR STS, NUREG-1433, Revision 2. The availability of this Technical Specification improvement was announced in the *Federal Register* on April 15, 2003, as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

NMC has reviewed the safety evaluation (SE) published on April 15, 2003 (68 FR 18294) as part of the CLIIP. This verification included a review of the NRC staff's evaluation and the supporting information provided to support TSTF-404. NMC has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to DAEC and justify this amendment for the incorporation of the changes to DAEC TS.

2.2 Optional Changes and Variations

NMC is not proposing any variations or deviations from the TS changes described in TSTF-404 or the NRC staff's model safety evaluation published on April 15, 2004.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

NMC has reviewed the proposed no significant hazards consideration determination published in the *Federal Register* on April 15, 2003 (68 FR 18294) as part of the CLIIP. NMC has concluded that the proposed determination presented in the *Federal Register* notice is applicable to DAEC and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

No new commitments are made in this request.

4.0 ENVIRONMENTAL EVALUATION

NMC has reviewed the environmental evaluation included in the model SE published on April 15, 2003 (68 FR 18294) as part of the CLIP. NMC has concluded that the NRC staff's findings presented in that evaluation are applicable to DAEC and the evaluation is hereby incorporated by reference for this application.

ENCLOSURE II

**Proposed Technical Specification Changes (Markups)
Duane Arnold Energy Center**

3.1 REACTIVITY CONTROL SYSTEMS

3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

LCO 3.1.8 Each SDV vent and drain valve shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTE

① Separate Condition entry is allowed for each SDV vent and drain line.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SDV vent or drain lines with one valve inoperable.	A.1 Restore valve to OPERABLE status. <i>Isolate the associated line.</i>	7 days
B. One or more SDV vent or drain lines with both valves inoperable.	B.1 NOTE 2. An isolated line may be unisolated under administrative control to allow draining and venting of the SDV. Isolate the associated line.	8 hours
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

ENCLOSURE III

**Proposed Technical Specification Pages
Duane Arnold Energy Center**

3.1 REACTIVITY CONTROL SYSTEMS

3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

LCO 3.1.8 Each SDV vent and drain valve shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTES-----

1. Separate Condition entry is allowed for each SDV vent and drain line.
 2. An isolated line may be unisolated under administrative control to allow draining and venting of the SDV.
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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SDV vent or drain lines with one valve inoperable.	A.1 Isolate the associated line.	7 days
B. One or more SDV vent or drain lines with both valves inoperable.	B.1 Isolate the associated line.	8 hours
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	12 hours