July 24, 2006

Mr. Gary Van Middlesworth
Vice President
Duane Arnold Energy Center
3277 DAEC Road
Palo, Iowa 52324-9785

SUBJECT: DUANE ARNOLD ENERGY CENTER - REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PROPOSED AMENDMENT TO REVISE THE LIMITING CONDITION FOR OPERATION (LCO) 3.10.1 (TAC NO. MD0293)

Dear Mr. Van Middlesworth:

Your letter of March 1, 2006, submitted a proposed amendment to revise the limiting condition for operation 3.10.1, to allow ancillary testing to occur during the evolutions associated with performing the American Society of Mechanical Engineers Code Class I leak test of the reactor pressure vessel, at the Duane Arnold Energy Center.

We are reviewing this information, and find that we need additional information as shown in the enclosed request for additional information (RAI). I discussed this RAI with Tony Browning of your organization on July 18, 2006, and he agreed to respond within 30 days of receipt of this RAI. Please contact me at (301) 415-2928 if you have questions.

Sincerely,

/RA/

Deirdre W. Spaulding, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-331

Enclosure:
RAI

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

RELATED TO THE PROPOSED AMENDMENT TO

REVISE THE LIMITING CONDITION FOR OPERATION (LCO) 3.10.1

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1. LCO 3.10.1 Rev 3.1a would allow testing in Mode 4 with average reactor coolant temperature drifting greater than 200 F as a result of decay heat. Primary containment requirements are relaxed in LCO 3.10.1 Rev 3.0 with the reasoning in the technical specification (TS) Bases that average reactor coolant temperature is greater than 200 F as a result of testing and not due to significant decay heat. Please explain why it is acceptable to be in Mode 4 (with average reactor coolant temperature greater than 200 F) vice Mode 3 with the presence of decay heat contributing to an increase in the average reactor coolant temperature.

2. LCO 3.4.7 “RCS Specific Activity,” is normally not required in Mode 4 because the reactor is normally not pressurized. Please provide justification for not including LCO 3.4.7 under LCO 3.10.1 Rev 3.1a requirements when in Mode 4 with average reactor coolant temperature greater than 200 F.

3. The Bases for TS 3.10.1 Rev 3.1a discusses conducting other unnamed testing while the TS 3.10.1 Rev 3.1a specifically mentions conducting only inservice leak or hydrostatic tests and control rod scram time tests. Please elaborate on the intent of the TS and Bases as written with regards to “other testing.”

4. The use of the verbiage “as a consequence of” in the LCO under TS 3.10.1 Rev 3.1a could result in steady state Mode 4 with reactor coolant temperature > 200 F even though testing is over and no longer being conducted. This seems to be the reasoning for eliminating the statement in the Bases for TS 3.10.1 Rev 3.0 which states that normal Mode 4 requirements are in effect immediately prior to and immediately after LCO 3.10.1 operations. Please elaborate on what would require returning to normal Mode 4 requirements after testing is completed.

ENCLOSURE

Duane Arnold Energy Center

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