



FPL Energy

Duane Arnold Energy Center

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August 17, 2006

NG-06-0516
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

Response to Request for Additional Information Related to the Proposed Amendment to Revise the Limiting Condition for Operation (LCO) 3.10.1 (TAC NO. MD0293)

- References:
- 1) G. Van Middlesworth (FPL Energy Duane Arnold) to USNRC, "Technical Specification Change Request (TSCR-078): Adoption of TSTF-484, Rev. 0, "Use of TS 3.10.1 for Scram Time Testing Activities," NG-06-0250, dated March 1, 2006.
 - 2) D. Spaulding (USNRC) to G. Van Middlesworth (FPL Energy Duane Arnold), "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)," dated July 24, 2006.
 - 3) TSTF Letter to USNRC, "Response to NRC Request for Additional Information Regarding TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities," TSTF-06-11, dated June 5, 2006.

In Reference 1, FPL Energy Duane Arnold requested an amendment to the Duane Arnold Energy Center (DAEC) Technical Specifications (TS) to revise the Limiting Condition for Operation (LCO) 3.10.1, to allow ancillary testing to occur during the evolutions associated with performing the American Society of Mechanical Engineers (ASME) Code Class I leak test of the reactor pressure vessel. The proposed changes to the DAEC TS are consistent with those previously docketed by the Technical Specification Task Force (TSTF) as a generic traveler, TSTF-484, Rev. 0, which is also under review by the Staff.

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The Staff has determined that additional information is needed in order to review our application (Reference 2). This request for additional information (RAI) is identical to the Staff's questions posed on TSTF-484, to which the TSTF responded in Reference 3. FPL Energy Duane Arnold has reviewed the Reference 3 responses and confirms that they are applicable to the DAEC, with the following plant-specific adjustments:

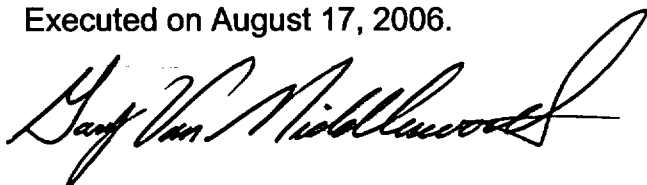
- The Improved Standard TS (ISTS), NUREG-1433, demarcation between MODE 3 and 4 cited in Reference 3 is 200°F. The corresponding DAEC TS definitions use 212 °F.
- The DAEC is a BWR/4 design, with variable speed main recirculation pumps. The Reference 3 statements regarding flow control valves in the BWR 5/6 design are not applicable to the DAEC.
- The ISTS LCO for "RCS Specific Activity" cited in Reference 3 is LCO 3.4.7. The corresponding LCO in the DAEC TS is LCO 3.4.6.
- The ISTS LCO for "RCS P/T Limits" cited in Reference 3 is LCO 3.4.10. The corresponding LCO in the DAEC TS is LCO 3.4.9.
- The ISTS Surveillance Requirement (SR) for Excess Flow Check Valves (EFCV) testing cited in Reference 3 is SR 3.6.1.3.10. The corresponding SR in the DAEC TS is SR 3.6.1.3.7.
- The ISTS SRs for scram time testing of control rods cited in Reference 3 are SR 3.1.4.1 and 3.1.4.4. The equivalent SRs in the DAEC TS are SR 3.1.4.1 and 3.1.4.2.

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

If you have any questions or require additional information, please contact Mr. Tony Browning at (319) 851-7750.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 17, 2006.



Gary Van Middlesworth
Vice President, Duane Arnold Energy Center
FPL Energy Duane Arnold, LLC

cc: Administrator, Region III, USNRC
Project Manager, DAEC, USNRC
Resident Inspector, DAEC, USNRC
D. McGhee (State of Iowa)