

50-331

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TO: Mr Rusche

FROM: Iowa Elec Light & Pwr Co
Cedar Rapids, Ia
L Liu

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6-17-76

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6-21-76

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DESCRIPTION

Ltr notarized 6-17-76.....trans the follow:

PLANT NAME: Duane Arnold

ENCLOSURE

Amdt to OL/Change to Tech Specs: Consisting of revision to tech specs with regard to Appendix "A" concerning peaking factors in DAEC tech specs.....(40 cys encl rec'd)

DO NOT REMOVE

SAFETY

FOR ACTION/INFORMATION

ENVIRO

6-21-76 ehf

ASSIGNED AD:

BRANCH CHIEF:

PROJECT MANAGER:

LIC. ASST.:

Leary (S)
Paulson
Parrish

ASSIGNED AD:

BRANCH CHIEF:

PROJECT MANAGER:

LIC. ASST.:

INTERNAL DISTRIBUTION

<input checked="" type="checkbox"/> REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	ENVIRO TECH
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	ERNST
<input checked="" type="checkbox"/> I & E (2)	SCHROEDER	BENAROYA	BALLARD
<input checked="" type="checkbox"/> OELD		LAINAS	SPANGLER
GOSSICK & STAFF	ENGINEERING	IPPOLITO	
MIPC	MCCARY		SITE TECH
CASE	KNIGHT	OPERATING REACTORS	GAMMILL
HANAUER	STWELL	STELLO	STEPP
HARLESS	PAWLICKI		HULMAN
		OPERATING TECH	
PROJECT MANAGEMENT	REACTOR SAFETY	EISENHUT	SITE ANALYSTS
TOYD	ROSS	SHAO	VOLLMER
P COLLINS	NOVAK	PAER	PUNCH
HOUSTON	ROZYTOCZY	SCHWENGER	J. COLLINS
PETERSON	CHECK	CRIMES	KREGER
MELTZ			
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	RUBENBERG	TEMPON & MULLER	

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<input checked="" type="checkbox"/> NSIC	LA PDR	
<input checked="" type="checkbox"/> ASLR	CONTRACTORS	
<input checked="" type="checkbox"/> ACIS 16	TO LA PARRISH	

6241

IOWA ELECTRIC LIGHT AND POWER COMPANY

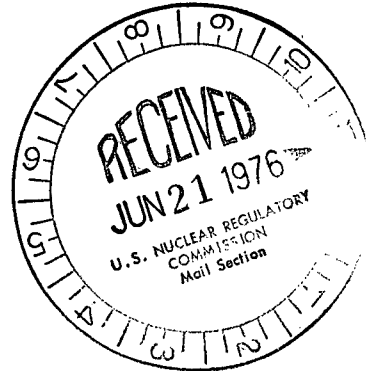
General Office
CEDAR RAPIDS, IOWA

June 17, 1976
IE-76-918

LEE LIU
VICE PRESIDENT - ENGINEERING

50-331

Mr. B. C. Rusche, Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D. C. 20545



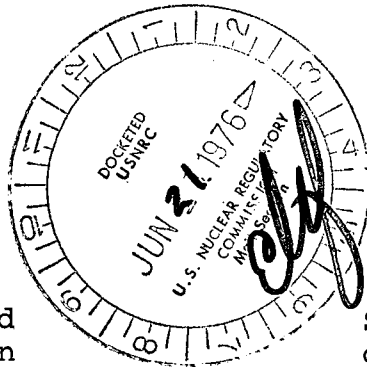
Dear Mr. Rusche:

Transmitted herewith, in accordance with the requirements of 10CFR50.59 and 50.90, is an application for amendment of DPR-49 to incorporate proposed changes in the Technical Specifications (Appendix A to license) for the Duane Arnold Energy Center (DAEC), described in the enclosure hereto.

This proposed change and the request for withdrawal of previously proposed changes have been reviewed and approved by the DAEC Operations Committee and the DAEC Safety Committee and do not involve a significant hazards consideration.

Three signed and notarized originals and 37 additional copies of this application are transmitted herewith. This application, consisting of the foregoing letter and enclosures hereto, is true and accurate to the best of my knowledge and belief.

Iowa Electric Light & Power Company



LL/OS/sk
cc: W/encl.
D. Arnold
J. Newman
J. Keppler
J. Shea

By Larry D. Root
Lee Liu
Vice President-Engineering

Sworn and subscribed to before me
on this 17th day of June, 1976.

Jean R. Smith
Notary Public in and for the State
of Iowa.

Jean R. Smith
NOTARY PUBLIC
STATE OF IOWA
Commission Expires
September 30, 1978

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PROPOSED CHANGE RTS-42B TO DAEC TECHNICAL SPECIFICATIONS

Proposed change RTS-42B approved by the NRC as a portion of Amendment 19 to Facility Operating License 49 issued on March 19, 1976 changed the total peaking factor from "2.62" to "2.61 (7 x 7 array) or 2.43 (8 x 8 array)". Through an oversight on our part, this change was not made on page 1.1-19 of the DAEC Technical Specifications. It is, therefore, requested that the change be made at this time.

PROPOSED CHANGE RTS-46 TO DAEC TECHNICAL SPECIFICATIONS

This change is no longer required because Amendment Number 19 to Facility Operating License 49 issued on March 19, 1976 incorporated the intent of proposed change RTS-46 by changing the maximum vessel pressure to a value shown to be correct by the DAEC Reload License Analysis. This value was different from the one submitted in RTS-46 which was based on the DAEC Plugged Core Analysis. For this reason we wish to withdraw RTS-46 from further consideration by the NRC.

PROPOSED CHANGE RTS-56 TO DAEC TECHNICAL SPECIFICATIONS

Proposed change RTS-56 proposed certain changes to Specification 6.5, Review and Audit, concerning the Safety Committee. Since the DAEC Technical Specifications concerning review and audit are at variance with the Standardized Technical Specifications (STS) in several areas, it is our intent to propose changes to Specification 6.5 to bring them into agreement with the STS. For this reason we wish to withdraw RTS-56 from further consideration by the NRC.

PROPOSED CHANGE RTS-69 TO DAEC TECHNICAL SPECIFICATIONS

I. Affected Technical Specifications

Appendix A of the Technical Specifications for the DAEC (DPR-49) provides as follows:

Specification 6.5, Review and Audit, provides the method by which independent review and audit of facility operations is accomplished by the DAEC Operations Committee and Safety Committee.

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following change in the Technical Specifications set forth in I above:

Delete the present Specification 6.5 and add the attached proposed Specification 6.5.

III. Justification for Proposed Change

This proposed change is being submitted so that the DAEC Specifications generally meet those required by the Standardized Technical Specifications. The only major change from the Standardized Technical Specifications (STS) concerns Design Change Request Safety Evaluations. The STS state that the Safety Committee shall review safety evaluations for changes to equipment or systems. The attached proposed Technical Specifications, however, list this as part of the Safety Committee's audit functions. Corporate policy established the requirements that all design changes be developed and approved within the Engineering organization which does not have direct responsibility for operation of the plant. This policy is applied to all components and systems of the plant whether they are part of or auxiliaries of the Nuclear Steam Supply System or not. The Engineering organization is responsible for the Safety Evaluation in conjunction with the design specifications and related design and licensing document changes. The complete design change package which includes the aforementioned documents is reviewed and approved by the Project Engineer, the Manager of Mechanical/Nuclear Engineering, and the Manager, Quality Assurance, or their designated alternates. The approved design change is then forwarded to the on-site Operations Committee for their review and approval. Design changes that would possibly involve an unreviewed safety question are forwarded to the Safety Committee. It is considered that the above action by off-site personnel results in an independent review process as intended by the STS. Periodic audits by the Safety Committee of design change evaluations is consistent with the intent of the STS when coupled with the independent review conducted by the Engineering Department.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

6.5 REVIEW AND AUDIT

6.5.1 Operations Committee

6.5.1.1 Function

The Operations Committee shall function to advise the Chief Engineer on all matters related to nuclear safety.

6.5.1.2 Composition

The Operations Committee shall be composed of the Assistant Chief Engineer and Supervisors from the following departments: Operations, Maintenance, Reactor and Plant Engineering, Radiation Protection and Quality.

The Assistant Chief Engineer shall act as the Chairman. One or more of the members shall be designated as Vice Chairman.

6.5.1.3 Alternates

All alternate members shall be appointed in writing by the Chief Engineer to serve on a permanent basis; however, no more than three alternates shall participate as voting members in Operations Committee activities at any one time.

6.5.1.4 Meeting Frequency

The Operations Committee shall meet at least once per calendar month and as convened by the Operations Committee Chairman or Vice Chairman.

6.5.1.5 Quorum

A quorum of the Operations Committee shall consist of the Chairman or Vice Chairman and five members including alternates.

6.5.1.6 Responsibilities

The Operations Committee shall be responsible for:

- a. Review of (1) all procedures required by Specification 6.8, Plant Operating Procedures, and changes thereto, (2) any other proposed procedures or changes thereto as determined by the Chief Engineer to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President-Generation and to the Chairman of the Safety Committee.
- f. Review of those Reportable Occurrences requiring 24 hour notification to the Commission.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Safety Committee.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Safety Committee.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Safety Committee.

6.5.1.7 Authority

The Operations Committee shall:

- a. Recommend to the Chief Engineer written approval or disapproval of items considered under Specification 6.5.1.6 (a) through (d) above.

- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6 (a) through (e) above constitutes an unreviewed safety question.

- c. Provide written notification within 24 hours to the Vice President-Generation and the Safety Committee of disagreement between the Operations Committee and the Chief Engineer; however, the Chief Engineer shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

6.5.1.8 Records

The Operations Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President-Generation and the Chairman of the Safety Committee.

6.5.2 Safety Committee

6.5.2.1 Function

The Safety Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations.

- b. Nuclear engineering.

- c. Chemistry and radiochemistry.
- d. Metallurgy.
- e. Instrumentation and control.
- f. Radiological safety.
- g. Mechanical and electrical engineering.
- h. Quality assurance practices.

6.5.2.2 Composition

The Safety Committee shall be composed of persons who have been appointed in writing by the President to serve on a permanent basis and who collectively have or have access to applicable technical and experience expertise in the following areas:

- a. Nuclear power plant operations.
- b. Nuclear engineering.
- c. Chemistry and radiochemistry.
- d. Instrumentation and control.
- e. Radiation protection.

f. Mechanical and electrical engineering.

g. Nuclear safety.

6.5.2.3 Alternates

All alternate members shall be appointed in writing by the President to serve on a permanent basis.

6.5.2.4 Consultants

Consultants shall be utilized as determined by the Safety Committee Chairman to provide expert advice to the Safety Committee.

6.5.2.5 Meeting Frequency

The Safety Committee shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

6.5.2.6 Quorum

A quorum of the Safety Committee shall consist of the Chairman or Vice Chairman and at least four members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

6.5.2.7 Review

The Safety Committee shall review:

- a. The safety evaluations for (1) changes to procedures, and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, technical specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. Reportable Occurrences requiring 24 hour notification to the Commission.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.

- i. Reports and meeting minutes of the Operations Committee.

6.5.2.8 Audits

Audits of facility activities shall be performed under the cognizance of the Safety Committee. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per 24 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 24 months.
- c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Preparedness Plan and implementing procedures at least once per 24 months.
- f. The Facility Security Plan and implementing procedures at least once per 24 months.

- g. Any other area of facility operation considered appropriate by the Safety Committee or the President.
- h. Design change request safety evaluations.

6.5.2.9 Authority

The Safety Committee shall report to and advise the President on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

6.5.2.10 Records

Records of Safety Committee activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each Safety Committee meeting shall be prepared, approved and forwarded to the President within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved and forwarded to the President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the President and to the management positions responsible for the areas audited within 30 days after completion of the audit.