

**AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL**  
(TEMPORARY FORM)

CONTROL NO: 5820

FILE: APP

<b>FROM:</b> Iowa Electric Light & Power Co. Cedar Rapids, Iowa Mr. C.W. Sandford			<b>DATE OF DOC</b> 6-21-74	<b>DATE REC'D</b> 6-26-74	<b>LTR</b> X	<b>TWX</b>	<b>RPT</b>	<b>OTHER</b>
<b>TO:</b> R.C. Deyoung			<b>ORIG</b> 1 signed	<b>CC</b>	<b>OTHER</b>	<b>SENT AEC PDR</b> XXX <b>SENT LOCAL PDR</b> XXX		
<b>CLASS</b>	<b>UNCLASS</b> XXX	<b>PROP INFO</b>	<b>INPUT</b> XXX	<b>NO CYS REC'D</b> 1	<b>DOCKET NO:</b> 50-331			
<b>DESCRIPTION:</b> Ltr requesting a revision to Appendix A to DPR-49 in the form of a change to Radiological Tech Specs.....					<b>ENCLOSURES:</b> <b>ACKNOWLEDGED</b>  <b>DO NOT REMOVE</b>			
<b>PLANT NAME:</b> Duane Arnold			<b>FOR ACTION/INFORMATION</b> 6-28-74 JB					

- |            |               |                |           |
|------------|---------------|----------------|-----------|
| BUTLER (L) | SCHWENCER (L) | ZIEMANN (L)    | REGAN (E) |
| W/ CYS     | W/ CYS        | W/ CYS         | W/ CYS    |
| CLARK (L)  | STOLZ (L)     | DICKER (E)     |           |
| W/ CYS     | W/ CYS        | W/ CYS         | W/ CYS    |
| DAPP (L)   | VASSALLO (L)  | KNIGHTON (E)   |           |
| W/ CYS     | W/ CYS        | W/ CYS         | W/ CYS    |
| KNIEL (L)  | PURPLE (L)    | YOUNGBLOOD (E) |           |
| W/ CYS     | W/ CYS        | W/ CYS         | W/ CYS    |

**INTERNAL DISTRIBUTION**

- |                     |                    |               |                 |                 |
|---------------------|--------------------|---------------|-----------------|-----------------|
| <del>REG FILE</del> | <u>TECH REVIEW</u> | DENTON        | <u>LIC ASST</u> | <u>A/T IND</u>  |
| AEC PDR             | HENDRIE            | GRIMES        | DIGGS (L)       | BRAITMAN        |
| OGC                 | SCHROEDER          | GAMMILL       | GEARIN (L)      | SALTZMAN        |
| MUNTZING/STAFF      | MACCARY            | KASTNER       | GOULBOURNE (L)  | B. HURT         |
| CASE                | KNIGHT             | BALLARD       | KREUTZER (E)    |                 |
| GIAMBUSSO           | PAWLICKI           | SPANGLER      | LEE (L)         | <u>PLANS</u>    |
| BOYD                | SHAO               |               | MAIGRET (L)     | MCDONALD        |
| MOORE (L)(LWR-2)    | STELLO             | <u>ENVIRO</u> | REED (E)        | CHAPMAN         |
| DEYOUNG (L)(LWR-1)  | HOUSTON            | MULLER        | SERVICE (L)     | DUBE w/input    |
| SKOVHOLT (L)        | NOVAK              | DICKER        | SHEPPARD (L)    | E. COUPE        |
| GOLLER (L)          | ROSS               | KNIGHTON      | SLATER (E)      | Schwencer       |
| P. COLLINS          | IPPOLITO           | YOUNGBLOOD    | SMITH (L)       | D. THOMPSON (2) |
| DENISE              | TEDESCO            | REGAN         | TEETS (L)       | KLECKER         |
| REG OPR             | LONG               | PROJECT MGR   | WILLIAMS (E)    | EISENHUT        |
| FILE & REGION (2)   | LAINAS             | <u>Ditman</u> | WILSON (L)      |                 |
| MORRIS              | BENAROYA           | HARLESS       |                 |                 |
| STEELE              | VOLLMER            |               |                 |                 |

**EXTERNAL DISTRIBUTION**

- |                                    |                               |  |                         |
|------------------------------------|-------------------------------|--|-------------------------|
| 1 - LOCAL PDR (Cedar Rapids, Iowa) |                               |  |                         |
| 1 - TIC (ABERNATHY)                | (1)(2)(10)-NATIONAL LABS      |  | 1-PDR-SAN/LA/NY         |
| 1 - NSIC (BUCHANAN)                | 1-ASLBP(E/W Bldg, Rm 529)     |  | 1-BROOKHAVEN NAT LAB    |
| 1 - ASLB                           | 1-W. PENNINGTON, Rm E-201 GT  |  | 1-G. ULRIKSON, ORNL     |
| 1 - P. R. DAVIS                    | 1-B&M SWINEBROAD, Rm E-201 GT |  | 1-AGMED (RUTH GUSSMAN)  |
| 16 - ACRS HOLDING Sent to Maigret  | 1-CONSULTANTS                 |  | Rm B-127 GT             |
| 6-28-74                            | NEWMARK/BLUME/AGBABIAN        |  | 1-RD..MUELLER, Rm F-309 |
|                                    |                               |  | GT                      |

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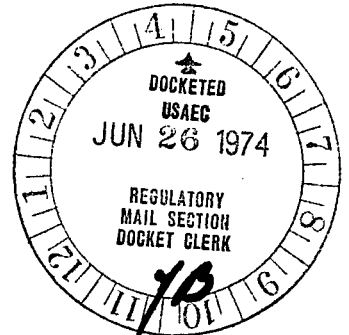
June 21, 1974



Mr. R. C. DeYoung  
Assistant Director for Light Water Reactors  
Group 1  
Directorate of Licensing  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

SUBJECT: Proposed Revision to Appendix A to DPR-49,  
Radiological Technical Specifications and  
Bases.

FILE: A-117, A-113



Dear Mr. DeYoung:

The purpose of this letter is to request changes to Technical Specification Tables 3.1-1 and 4.1-2 concerning Turbine Control Valve Fast Closure on loss of control oil pressure (Radiological Technical Specification Proposed Change 15) and Table 3.2-B concerning Suppression Chamber High Level (Radiological Technical Specification Proposed Change 16). The changes and the reasons for the changes are as follows:

Radiological Technical Specification Proposed Change 15

p.3.1-4, Table 3.1-1: Change Trip Level Setting for Turbine Control Valve Fast Closure (Loss of Control Oil Pressure) from "Setpoint >800 psig Control Oil Pressure" to "Within 30 milliseconds of the start of Control Valve Fast Closure".

p.3.1-12, Table 4.1-2: Change Calibration for Turbine Control Valve Oil Pressure Trip from "Standard Pressure Source" to "Note 6".

p.3.1-14, Notes For Table 4.1-2:

Add the following Note 6, "Measure time interval base line data for each operating cycle as follows: From energization of fast acting solenoid, measure time interval to response of oil pressure switch, HFA relay (RPS) and position response of control valves."

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p.3.1-21, Second paragraph of bases:

Delete the paragraph beginning with "Turbine control valve fast closure ---" and substitute the following: "Turbine control valve fast closure scram trip shall initiate within 30 milliseconds of the start of control valve fast closure. The trip level setting is verified by measuring the time interval from energizing the fast acting solenoid (from valve test switch) to pressure switch response and compared to base line data taken during each refueling outage. Fast closure trip level setting is sensed by measuring disc dump electro-hydraulic oil line pressure (Relay Emergency Trip Supply) which decreases rapidly upon generator load rejection, and pressure switch response is detected prior to fast closure of the control valves. This scram is only effective when turbine steam flow is above 30% of rated as measured by turbine first stage pressure (approximately 206 psia)".

The present pressure trip setting is not directly enough associated with essential criteria that reactor scram occurs within the required time. The important point is that reactor scram occurs within 30 milliseconds of control valve fast closure; not at some certain pressure. General Electric intends to make this change generically on BWR's. This change was first submitted to the USAEC for the Hatch Technical Specifications, Amendment 42, dated February, 1974. Duane Arnold Energy Center has an additional reason for requesting the above Technical Specification change. Specification 4.1.A requires that the turbine control valve fast closure RPS trips be subjected to a functional test once per month. Since the four control valves open sequentially, it is impossible to actually move all control valves during operation unless the power level is sufficiently high that all four valves are open. The above changes provide a means of demonstrating correct operation of the subject trips.

Radiological Technical Specification Proposed Change 16

p.3.2-13, Table 3.2-B: Change the Trip Level Setting for Suppression Chamber High Level from " $\leq 2$ " above normal water level to " $\leq 5$ " above normal water level".

The General Electric design criteria for the Suppression Chamber High Level for DAEC has always been 5 inches. The 5" setting assures adequate margin in the torus free volume relative to that used in the containment pressure response analysis in Section 14 of the FSAR. The setting of  $\leq 2$  inches above normal water level which we now have in our Technical Specifications is actually the fluctuation of water level during normal plant operations. When DAEC was being constructed the setting of 2 inches was inadvertently used in the Technical Specifications and the switch was placed at that position. When the error was recently detected, the switch was moved to the 5 inch level but, inadvertently, this was implemented prior to the receipt of Technical Specification approval. This has been the subject of a letter to Region III DRO which describes the steps which have been taken to assure that changes are not made before Technical Specification approval is received.

6/21/74

We believe that it would be unwise to return the switch to the 2 inch level pending Technical Specification approval because the proposed change essentially corrects an error in paperwork.

We respectfully request that the above changes be approved as soon as possible. We plan to submit additional Technical Specification changes for which we will be requesting commission approval in the coming month, but we believe the foregoing changes require more immediate action.

The subject proposed changes have been reviewed and approved by the DAEC Operations Committee and the Safety Committee. They find that proposed changes do not involve a significant hazards consideration.

Thank you for your assistance in this matter.

Very truly yours



C. W. Sandford  
Executive Vice President  
Iowa Electric Light & Power Company

OCS/CWS/bh

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