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 MCGAUGHY, R.W. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-49, consisting of
 proposed change RTS-154A, revised Tech Specs re RCIC
 automatic reset & automatic suction switchover, per NUREG
 0737, Items II.K.3.13b & II.K.3.22.

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Iowa Electric Light and Power Company

April 10, 1984
NG-84-1466

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
RCIC Automatic Reset and RCIC Automatic Suction
Switchover from CST to Suppression Pool

Reference: Letter, R. McGaughy (IELP) to H. Denton (NRC)
dated July 20, 1983 (NG-83-2294) - RTS-154

Dear Mr. Denton:

Transmitted herewith, in accordance with the requirements of 10 CFR 50.59 and 10 CFR 50.90, is an application for amendment to Appendix A (Technical Specifications) of Operating License DPR-49 for the Duane Arnold Energy Center (DAEC). The attached Technical Specification pages are identical to those submitted in RTS-154; however, page 3.5-7 supersedes the same page submitted under the referenced cover letter. The only difference is that the last word in paragraph E.1.a has been changed from "reset" to "restart" to clarify the test method.

This application, proposed change RTS-154A, has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. The proposed change has also been agreed to, in principle, by our NRC Project Manager. As this amendment request is identical to RTS-154, except for the aforementioned wording change, we believe an additional amendment fee is not required.

Pursuant to the requirements of 10 CFR 50.91, a copy of this submittal and analysis of no significant hazards considerations is being forwarded to our appointed state official.

This application, which consists of three signed originals and 37 copies with their enclosures, is true and accurate to the best of my knowledge and belief.

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PDR ADOCK 05000331
PDR

RWM/SLS/dmb*
Attachments:

cc: S. Swails
L. Liu
S. Tuthill
M. Thadani
T. Houvenagle (ICC)
J. Keppler (NRC R-III)
NRC Resident Office

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY

Richard W. McGaughy
Richard W. McGaughy
Manager, Nuclear Division

Subscribed and sworn to Before Me on
this 10th day of April 1984.

Kathleen M. Furman
Notary Public in and for the State of Iowa

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Proposed Change RTS-154A
to the
Duane Arnold Energy Center
Technical Specifications

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend Appendix A (Technical Specifications) to said license by deleting current pages and replacing them with attached, new pages. A List of the Affected Pages is given below.

The proposed amendment, RTS-154A, changes Table 3.2-B and Section 4.5.E.1 to reflect RCIC suction switchover from CST to suppression pool. Section 4.5.E.1.a has been changed to include the RCIC restart test with the Simulated Automatic Actuation Test. This revised amendment (RTS-154A) is identical to RTS-154 except for a single word change on page 3.5-7. The last word in paragraph E.1.a. has been changed from "reset" to "restart." This is being done at the NRC's request.

LIST OF AFFECTED PAGES

3.2-12
3.5-7
3.5-8

Evaluation of Change
In Response To
NUREG-0737 Item II.K.13B
With Respect to 10 CFR 50.92

The enclosed application is judged to involve no significant hazards based upon the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The installation of automatic RCIC reset utilizes existing equipment as described in the FSAR. The modification consists of using the steam supply valve to shutoff steam to the RCIC turbine rather than the turbine trip valve which provides for automatic reset.

Operating experience, based on a study of past BWR LER's, has demonstrated that steam supply valve reliability is as good or better than that of the turbine trip valve.

Therefore, the probability or magnitude of an accident or malfunction of safety-related equipment is not increased.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

There has been no change in the RCIC initiation logic. RCIC is still initiated by a low level signal opening the steam supply valve (the turbine trip valve is already open). The high level trip signal for terminating RCIC operation has been switched from the turbine trip valve to the steam supply valve. These valves are in series; therefore, a malfunction of the steam supply valve or its trip system would have the same consequences as a malfunction of the turbine trip valve prior to this change.

Therefore, the possibility of an accident or a malfunction of a different type than any evaluated previously in the FSAR is not created.

- (3) Does the proposed amendment involve a significant reduction in the margin of safety?

The RCIC system still operates between the same trip points using components at least as reliable as the components used prior to this change. The magnitude of the consequences of a malfunction have not been increased and the possibility of a new accident or malfunction has not been created.

Therefore, the margin of safety has not been reduced. Actually, the margin of safety has been increased because operator action is no longer required to reset the system after a high level trip.

In the April 6, 1983 Federal Register, the NRC published examples of amendments that are not likely to involve a significant hazards concern. Example number seven of that list states:

"A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

This amendment request is judged to fall into the above category.

Evaluation of Change
In Response To
NUREG-0737 Item II.K.3.22
In Respect to 10 CFR 50.92

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No, the only change with respect to RCIC suction is to make an automatic switch from CST to suppression pool instead of a manual switch. There has been no change of equipment so the probability or consequence of a previously analyzed accident does not increase.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

There is the possibility of a component malfunction (the automatic switch), but because the manual switch is still available, there is no possibility of a new or different kind of accident previously evaluated.

- (3) Is the margin of safety as defined in the basis of any technical specification reduced?

No, because the automatic switch has been added and the manual switch is still there; the margin of safety is increased.

In the April 6, 1983 Federal Register, the NRC published examples of amendments that are not likely to involve a significant hazards concern. Example number seven of that list states:

"A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

This amendment request is judged to fall into the above category.