

Proposed Change RTS-169  
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.

This change is being submitted to incorporate restrictions regarding overtime for plant operators, and is provided to meet the requirements set forth in NUREG-0737 Item I.A.1.3.1. The proposed change consists of a new section being added to section 6.8 of the administrative section of the DAEC Technical Specifications.

List of Affected Pages

6.8-2

8409070198 840831  
PDR ADOCK 05000331  
P PDR

Evaluation of Proposed Change  
RTS-169 with Respect to 10CFR50.92

In accordance with the requirements of 10CFR50.92, 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?

Response: No. This change is administrative in nature and is being made to incorporate restrictions on limiting Operator overtime as outlined in NUREG-0737 Item I.A.1.3.1.

Since this change is administrative in nature and is being made to implement an additional control not presently included in the Technical Specification, and no physical change is being made to the plant or plant operating procedures, there is no increase in the probability or consequences of an accident previously evaluated.

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

Response: No. As stated above, this change is administrative in nature and, therefore, does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No. This change is administrative in nature and consists only of restrictions on limiting operator overtime. There is no significant reduction in the margin of safety.

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 two of this states:

"A change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications: for example, a more stringent surveillance requirement."

This application is judged to fall into this category. The enclosed application is, therefore, judged to involve no significant hazards.

7. Procedures required by the Emergency Plan.
  8. Procedures required by the Plant Security Plan.
  9. Operation of radioactive waste systems.
  10. Fire Protection Program implementation.
  11. A preventative maintenance and periodic visual examination program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient to as low as practical levels. This program shall also include provisions for performance of periodic systems leak tests of each system no less frequently than at refueling cycle intervals.
  12. Program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions, including training of personnel, procedures for monitoring and provisions for maintenance of sampling and analysis equipment.
  13. Administrative procedures for shift overtime for operating personnel. |
- 6.8.2 Procedures described in 6.8.1 above, and changes thereto, shall be reviewed by the Operations Committee and approved by the Plant Superintendent-Nuclear prior to implementation, except as provided in 6.8.3 below.
- 6.8.3 Temporary minor changes to procedures described in 6.8.1 above which do not change the intent of the original procedure may be made with the concurrence of two members of the plant management staff, at least one of whom shall hold a senior operator license. Such changes shall be documented and promptly reviewed by the Operations Committee and by the Plant Superintendent-Nuclear. Subsequent incorporation, if necessary, as a permanent change, shall be in accord with 6.8.2 above.