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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331  
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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: Revised application for amend to License DPR-49, revising  
 Tech Specs to adjust two testing requirements for snubbers &  
 incorporate administrative changes.

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Iowa Electric Light and Power Company

September 14, 1984  
NG-84-3978

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  
RTS-161, Technical Specification Change

Dear Mr. Denton:

Transmitted herewith is a revision to our application for amendment to Appendix A (Technical Specifications) to Operating License DPR-49 for the Duane Arnold Energy Center (DAEC). The application was submitted by letter (NG-84-2263) of August 20, 1984. The purpose of this revision is to clarify the description of changes in that application. There are no changes to the intent or technical nature of that application. As stated in our previous submittal, the proposed changes in that application are being made to clarify existing wording, correct typographical errors, and adjust the testing requirements for snubbers. Also, the snubber listings are being deleted from the Technical Specifications in accordance with the guidelines of Generic Letter 84-13.

The proposed Technical Specification change has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. A check for \$150 was submitted with the original application and, under the provisions of 10 CFR 170, the balance of the application fee will be paid upon billing. We request that this amendment become effective 30 days after receipt of NRC approval to allow sufficient time for our procedure implementation.

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.

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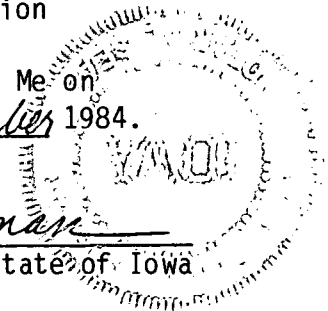
This application, which consists of three signed originals and 37 copies with their enclosures, is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

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

Subscribed and sworn to Before Me on  
this 14th day of September 1984.

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



RWM/MJM/dmb\*

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92  
2) Proposed Change RTS-161 Including List of Affected Pages

cc: M. Murphy  
L. Liu  
S. Tuthill  
M. Thadani  
T. Houvenagle (ICC)  
NRC Resident Office

## EVALUATION OF CHANGE PURSUANT TO 10 CFR 50.92

### Summary

This application (RTS-161) is proposed to revise the Duane Arnold Energy Center (DAEC) Technical Specification (TS) to adjust two testing requirements for snubbers and incorporate administrative changes in the TS. One of these administrative changes is the deletion of the snubber listing from the TS which is being done in accordance with the guidelines of Generic Letter 84-13. The remainder of the administrative changes are being made to clarify existing text and correct typos and will be mentioned below. The two changes in testing requirements will be addressed specifically below.

In accordance with the requirements of 10CFR50.92, the enclosed application is judged to involve no significant hazards based on the following information:

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

Response:

Reducing the percentage of additional snubbers to be tested from 10% to 5% (Section 4.6.H.3) does not involve a significant increase in the probability or consequence of an accident. The initial test remains the same and is sufficient to provide an adequate sampling of the snubbers. Changing the 10% requirement to 5% will merely help reduce the amount of additional testing which is presently in excess of what is necessary.

Deleting the requirement to functionally test snubbers with a 50% increase in drag force (Section 4.6.H.5.2) does not involve a significant increase in the probability or consequences of an accident. The measured drag force is usually a small fraction of the maximum drag force. A 50% increase in drag force is relatively insignificant and causes unnecessary additional testing. Present test machines use load cells that are not sensitive nor consistent enough to give accurate readings. The measured drag force of smaller snubbers can be on the order of 5-15 pounds force. The range of a typical load cell is 0-5000 pounds force with a sensitivity of  $\pm .1\%$  or 5 pounds force. Therefore, the 50% limit can be exceeded without any effects from the snubber. Also, additional testing activities associated with this requirement would cause excessive and unnecessary exposure to personnel.

The remainder of the changes of this proposal are administrative in nature and do not involve a significant increase in the probability or consequences of an accident.

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

Reducing the percentage of additional snubbers to be tested from 10% to 5% does not create the possibility of any new accident. This trimming

of excess additional testing will not introduce any unevaluated situations.

Deleting the requirement to functionally re-test snubbers with a 50% increase in the drag force does not create the possibility of any new accident. The snubbers will still have to meet test requirements regarding the maximum drag force.

The remainder of the changes of this proposal are administrative in nature and do not create the possibility of a new accident or malfunction.

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

Reducing the percentage of additional snubbers to be tested from 10% to 5% does not reduce the margin of safety. The initial test remains unchanged and provides sufficient sampling of the snubbers. This change will only reduce the amount of additional testing required, which is presently in excess of what is necessary.

Deleting the requirement to functionally test snubbers with a 50% increase in drag force does not reduce the margin of safety. The snubber will still have to meet the test requirements regarding the maximum drag force which ensure operational acceptance.

The remainder of the changes in this proposal are administrative and do not reduce the margin of safety.