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ACCESSION NBR: 8410220102 DOC. DATE: 84/10/17 NOTARIZED: YES DOCKET #
 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH. NAME AUTHOR AFFILIATION
 MCGAUGHY, R.W. Iowa Electric Light & Power Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-49, consisting of
 Proposed Change Request RTS-174, re incorporation of Tech
 Specs for action statement if limiting condition for
 operation cannot be met, Fee paid.

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Iowa Electric Light and Power Company

October 17, 1984

NG-84-4273

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
Maintenance of Filled Discharge Piping-RTS-174

Dear Mr. Denton:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.59 and 50.90, Iowa Electric Light and Power Company hereby requests revision to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

The purpose of this proposed change request is to incorporate, into DAEC Technical Specifications 3.5.H and 3.7.C, an action statement if the associated limiting condition for operation (LCO) cannot be met. Currently, insufficient direction is provided to DAEC plant operating personnel if the LCO cannot be met.

This proposed change request, RTS-174, has been reviewed by both the DAEC Operations Committee and Safety Committee.

In accordance with the requirements of 10 CFR Part 170, we are enclosing the required application fee of \$150.

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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PDR ADDCK 05000331
P PDR

Rec'd w/ check \$150.00

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Mr. Harold Denton
October 17, 1984
NG-84-4273
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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 17th day of October 1984.

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

RWM/MSG/dmb*

Attachments: 1. Evaluation of Change Pursuant to 10CFR50.92
2. List of Affected Pages

cc: M. Grim
L. Liu
S. Tuthill
M. Thadani
T. Houvenagle (ICC)
J. Keppler (NRC R-III)
NRC Resident Office
Commitment Control No. AI-4006

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Summary

The purpose of this proposed technical specification change request (RTS-174) is to incorporate, into DAEC Technical Specifications 3.5.H and 3.7.C, an action statement if the associated limiting condition for operation (LCO) cannot be met. Currently, no direction is provided to DAEC plant operating personnel if the LCOs cannot be met.

In accordance with the requirements of 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?

Response: The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated as this is considered an administrative change. The purpose of the proposed license amendment is to provide direction to operating plant personnel if a LCO cannot be met. As discussed in Technical Specification basis 3.5, the requirement that pump discharge piping be maintained in a filled condition is to prevent a water hammer. It is noted, however, that the systems affected by this phenomenon would still perform their design function even with occurrence of a water hammer. The proposed license amendment would instruct plant operators to take appropriate action within one hour upon loss or reduction of pump discharge piping pressure to the core spray or LPCI subsystems; or upon loss of secondary containment. The change to Technical Specification 3.7.C (secondary containment) is being requested to incorporate guidance contained in the Standard Technical Specifications.

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

Response: The proposed license amendment request does not create the possibility of a new or different kind of accident from any accident previously evaluated. The addition of an action statement, upon loss of discharge piping pressure, will ensure the phenomenon of water hammer is precluded although the affected systems are designed to perform their intended function should a water hammer occur. The change to Technical Specification 3.7.C (secondary containment) is being requested to incorporate guidance contained in the Standard Technical Specifications. The proposed license amendment is an

administrative change which provides operating personnel with guidance upon loss or reduction of pump discharge piping pressure to the core spray or LPCI subsystems; or upon loss of secondary containment integrity.

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

Response: The proposed license amendment does not affect the plant margin of safety as this change is considered administrative in nature.

In the April 6, 1983 Federal Register, the NRC published examples of license amendments that are not likely to involve a significant hazards concern if operation of the facility, in accordance with the proposed amendment, involves only one or more of the following examples:

- (i) A purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature.
- (ii) A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications: for example, a more stringent surveillance requirement.

Iowa Electric believes this proposed license amendment request (RTS-174) does not involve a significant hazards concern as it clearly fits within the framework of the above examples.