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 ROOT, L. D. Iowa Electric Light & Power Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Submits supplemental info to Amend 58 to Tech Specs, per 800318 ltr. Current requirement of once/operating cycle for functional testing of 4.16 kV emergency undervoltage (loss of voltage) instrumentation will be retained.

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OCT 22 1981

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Iowa Electric Light and Power Company

October 14, 1981
LDR-81-293

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
OF NUCLEAR DIVISION

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



Dear Mr. Denton:

This letter is submitted as supplemental information to our letter of March 18, 1980, LDR-80-80, and is intended to close out an issue left open by our proposed Technical Specification amendment transmittal therewith.

By letter of June 2, 1977 from Mr. George Lear of the U.S. NRC, Iowa Electric Light and Power Company was requested to:

- "(1) Propose plant modifications as necessary to meet staff positions, or
- (2) Provide a detailed analysis which shows your facility design has equivalent capabilities and protective features.

. . .apply, within forty-five days of receipt of this letter, for an amendment to your facility operating license(s) to incorporate comparable technical specifications to those presented in the enclosure."

By letter of August 30, 1977, IE-77-1624, Iowa Electric submitted a proposed Technical Specification amendment to the NRC. This application was amended by a submittal of March 18, 1980, LDR-80-80. The proposed amendment, as revised, was approved by the NRC and included in Amendment 58 to the DAEC Technical Specifications.

One item of our March 18, 1980 letter stated:

"We have conformed the enclosed with the BWR Standard Technical Specifications to the maximum extent possible without additional modifications to those proposed in our August 30, 1977 submittal. The only surveillance requirement not conforming is the frequency of functional testing in Table 4.2-B item 13a. Iowa Electric will modify the design of these relays to allow monthly functional testing during the 1981 refueling outage. A Technical Specification will be proposed for NRC issuance during the 1981 refueling outage.

Subsequent to our letter of March 18, 1980, the NRC issued NUREG-0123, Revision 3, received by Iowa Electric on December 30, 1980. Review of Table 4.3.3.1-1 Item D, Loss of Power, indicates that the channel functional

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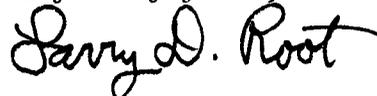
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test is not applicable. The current DAEC Technical Specification Instrument Functional Test requirement of once/operating cycle therefore now exceeds the standard Technical Specification guidance. It is therefore our intent to retain the current requirement for functional testing of the 4.16 kv emergency bus undervoltage (loss of voltage) instrumentation.

Please contact this office if there are any comments or questions concerning this matter.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/BR/mb*

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