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 FACIL:50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH.NAME AUTHOR AFFILIATION
 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,consisting
 of Proposed Change RTS-115D to Tech Specs re noble gas
 monitoring & annual verification of cumulative air dose.
 Class III fee submitted w/790829 application.

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Iowa Electric Light and Power Company
October 17, 1983
NG-83-3586

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-115D, Appendix I Technical Specifications

Dear Mr. Denton:

Transmitted herewith is a revision to our application for amendment to Appendix A and Appendix B (Technical Specifications) to Operating License DPR-49 for the Duane Arnold Energy Center (DAEC). The application (RTS-115) was submitted by letter of August 29, 1979, LDR-19-172, and revised by our submittals of June 15, 1982, LDR-82-176; April 16, 1983, NG-83-1147; and July 29, 1983, NG-83-2631.

This revision, consisting of RTS-115D, incorporates comments discussed by telephone during the week of September 26 through 30, 1983 between Iowa Electric and NRC staff representatives. This proposed revision has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee.

As stated in our previous application, Appendix B to the Technical Specifications is deleted in its entirety. Also, as stated in our previous application and discussed with the staff members, it is anticipated that complete implementation of this Technical Specification Amendment will require approximately 18 months following NRC issuance. The actual implementation time will depend on the actual amendment approved and will consider any potential plant modifications, purchasing additional equipment and training personnel.

A Class III amendment fee of \$4,000 was submitted with the original application. Since this is a revision to the application, no additional fee is required.

Pursuant to the requirements of 10 CFR 50.91, a copy of this application and analysis of no significant hazards considerations is being sent to our appointed state official. Three signed and 37 additional copies

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Mr. Harold Denton
October 17, 1983
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of this revision are transmitted. This application, consisting of the foregoing letter and enclosures, is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY *R. W. McGaughey*
Richard W. McGaughey
Manager, Nuclear Division

Subscribed and sworn to Before Me on
this 17th day of October 1983

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

RWM/BWR/dmh*

Attachment: 1) Evaluation of Change With Respect to 10 CFR 50.92
2) Description of Proposed Change RTS-115D
3) List of Affected Pages
4) RTS-115D Revised Pages

cc: B. Reid
L. Liu
S. Tuthill
M. Thadani (NRC)
C. Willis (NRC)
T. Houvenagle (ICC)
NRC Resident Office

EVALUATION OF CHANGE
WITH RESPECT TO 10 CFR 50.92

This revision to proposed Technical Specification Amendment RTS-115 is being made to incorporate comments as discussed between representatives of Iowa Electric Light and Power Company and the NRC Staff. In the April 6, 1983 Federal Register, the NRC published a list of examples of amendments that are not likely to involve significant hazards concerns. Examples one and two of this list state:

"A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or change in nomenclature."

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

The revisions included in this application are described in the attached description of proposed change and are judged to fall into the above categories. The enclosed application is, therefore, judged to involve no significant hazards.