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DENTON,H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Suppl to 830720 application to amend License DPR-49, consisting of Rev 1 to Proposed Change RTS-152 re min required flowrate for RHR svc water sys.

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Iowa Electric Light and Power Company
January 27, 1984
NG-84-0173

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
Revised Requirements for the Residual Heat Removal Service Water System

Dear Mr. Denton:

In accordance with the requirements of 10 CFR 50.59 and 10 CFR 50.90, we transmitted our proposed technical specification change regarding the minimum required flowrate for the Residual Heat Removal Service Water (RHRSW) System, (RTS-152; NG-83-1931, July 20, 1983). We hereby amend that application with the enclosed technical specification page changes.

This amendment has been reviewed by the Duane Arnold Energy Center Operations Committee and the Safety Committee. A check for $4,000 was submitted with our original application and, therefore, no additional fee is required.

Three signed and 37 additional copies of this application are transmitted herewith. 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. 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 Richard W. McGaughy
Richard W. McGaughy
Manager, Nuclear Division

Subscribed and sworn to Before Me on this 30th day of January, 1984.

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

RWM/RAB/dmb*
Attachments:
1) Revision 1 to Proposed Change RTS-152
2) Evaluation per 10 CFR 50.92
3) Technical Specification pages: 3.5-4, 3.5-5, 3.5-17

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

A001

REVISION 1 TO
PROPOSED CHANGE RTS-152
TO THE
DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The purpose of this revision to our original submittal, RTS-152 (NG-83-1931, July 20, 1983), is to correct a discrepancy between the bases in the technical specifications and the UFSAR discovered subsequent to the original application. The corresponding Limiting Conditions for Operation (LCO) has also been rewritten to reflect the above change. In addition several administrative changes are being made to Section 3.5.C. A list of the affected pages is given below.

The current Technical Specification Bases state that only one RHR Service Water (RHRSW) pump is required to be operable to meet the design basis event requirements. However, the analysis of the design basis event given in the UFSAR states that two pumps are required to provide the necessary coolant flow. Subsequent investigation has determined that the UFSAR analysis is correct and that the technical specifications need to be revised accordingly. Also, the corresponding LCO has been revised to specifically address the situation where one pump is inoperable in each loop. Based upon the results of the design basis event, this condition is similar to having one subsystem inoperable, as two pumps are needed to meet the required flow rate. Thus, the same LCO has been applied to this situation. In addition, the diesel generator surveillance requirements for the RHRSW system are being modified to remove the daily testing requirements.

An LCO is being added to Section 3.5.C to address the situation when the other requirements cannot be met, the reactor is to be brought to Cold Shutdown within 24 hours. This is to be consistent with the requirements of the other systems in Section 3.5.

The changes being made are as follows:

(1) Change the bases to Section 3.5 to reflect that two RHRSW pumps are required to meet the design basis requirement.

(2) Add an LCO to Section 3.5.C to specifically address the situation of one inoperable pump RHRSW in each loop and renumber the section accordingly.

(3) Clarify the operability requirements of an RHRSW subsystem as given in section 3.5.C.4 to be consistent with section 3.5.C.2.

(4) Correct a typographical error in section 3.5.C.4 to reflect that each RHRSW subsystem has only one associated diesel generator.

(5) Add an LCO to section 3.5.C to address the situation when the requirements of section 3.5.C cannot be met.

(6) Modify the Surveillance Requirements in Section 3.5.C.4 to remove the daily testing of the diesel generators.

LIST OF PAGES AFFECTED

3.5-4**
3.5-5*
3.5-17**

* Page revised from RTS-152
** New page

EVALUATION OF CHANGE WITH RESPECT TO 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?

This change corrects a discrepancy between the technical specification bases, which states that only one RHR Service Water Pump is needed for the design basis event, whereas the UFSAR states that a minimum of two pumps are required to be operable. Therefore, the probability of occurrence or the magnitude of an accident previously analyzed is not increased as this change corrects the bases to agree with the results of the UFSAR analysis.

The additional Limiting Condition for Operation (LCO) to address one out-of-service pump in each subsystem is being included for clarity and is considered consistent with the above change. Therefore, the probability of occurrence or the magnitude of an accident previously analyzed is not increased by this change.

Daily testing of the diesel generators (D/G) was deemed to be excessive and would degrade reliability. Thus relaxing the requirement to do immediate testing only will improve D/G reliability and plant safety, while still insuring operability as required by the LCO. These testing requirements for D/G's are consistent with the requirements given in Section 3.5 for other ECCS equipment, e.g., Core Spray; thus, the probability of occurrence or consequences of an accident or malfunction of equipment important-to-safety previously analyzed are not increased by this change.

The administrative changes are being made for the purposes of clarity and consistency with the remainder of Section 3.5 of the Technical Specifications and as such do not increase the probability or magnitude of any accident previously analyzed.

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

The correction of this discrepancy does not introduce the possibility of an event not previously analyzed in the UFSAR, as the original analysis determined the minimum number of pumps required to be operable.

The additional LCO addressing one pump out-of-service in each subsystem is being included for clarity and is consistent with the above change. Thus, the possibility of a new or different kind of accident from those previously analyzed is not created.

The failure of a diesel genereator has already been considered in the UFSAR, thus this change to the testing requirements does not introduce the possibility of a new or different kind of accident.

The administrative changes being made are for clarity and consistency with the remainder of Section 3.5 and as such do not create the possibility of a new or different kind of accident.

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

By correcting this discrepancy, the margin of safety, as defined in the bases of the technical specifications, will be increased to agree with the margin as defined by the original analysis.

The additional LCO addressing one pump out-of-service in each subsystem is being introduced for clarity and is consistent with the above change. Therefore the margin of safety is not impacted by this change.

Excessive testing of components degrades reliability and thus impacts plant safety. This change to the diesel generator testing requirements will remove the excessive testing, e.g., daily testing of the D/G's, while still insuring operability through the immediate testing requirements; thus the margin of safety is not reduced by this change.

The administrative changes being made are for the purposes of clarity and consistency with the remainder of section 3.5 of the Technical Specifications and thus do not effect the margin of safety.

In the April 6, 1983 Federal Register, the NRC published a list of examples of amendments that are not likely to involve a significant hazards concern. Example number one of that list states:

"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."

The purpose of this submittal is to correct the discrepancy between the current technical specification bases and the UFSAR analysis, and thus falls within the scope of the above example.

The change to the D/G testing requirements for the RHRSW system makes it consistent with the D/G testing requirements for the remaining ECCS equipment as given in Section 3.5; therefore, this example is judged to apply.

The administrative changes being made are for clarity and consistency with the remainder of Section 3.5 and thus falls within the scope of this example.

Example number two of the April 6 list 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."

The situation of one pump inoperable in each subsystem is currently not explicitly addressed in the Technical Specification. The new LCO being added is intended to clarify this case and thus is judged to constitute an additional limitation under the above example.