

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8403230004 DOC.DATE: 84/03/16 NOTARIZED: YES DOCKET #  
 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.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for rev to License DPR-46,changing Tech Specs re  
 primary containment leakage test requirements.

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 TITLE: OR Submittal: Append J Containment Leak Rate Testing

## NOTES:

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Iowa Electric Light and Power Company

March 16, 1984

NG-84-0668

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  
Primary Containment Leakage Test Requirements

- References:
- 1) Safety Evaluation Report, D. Eisenhower (NRC) to L. Liu (IELP), January 17, 1984
  - 2) Letter, L. Liu (IELP) to H. Denton (NRC), November 5, 1981
  - 3) Letter, L. Liu (IELP) to H. Denton (NRC), August 29, 1978
  - 4) Letter, L. Liu (IELP) to K. Goller (NRC), October 13, 1975
  - 5) Telephone Conference between NRC and IELP, October 1, 1982

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 proposed TS revisions are in response to your request pursuant to reference 1 and reflect your findings and dispositioning of the exemptions we requested in references 2 through 5. In addition, we have included other miscellaneous, albeit, minor changes.

This application, proposed change RTS-112B, has been reviewed by both our DAEC Operations Committee and DAEC Safety Committee.

A processing fee is not being included in this submittal for the following reasons. First, this amendment supersedes previously submitted RTS-112 (reference 3) and RTS-112A (reference 5). Second, the NRC staff has already reviewed, in principal, these TS changes; the Staff dispositioned the changes in reference 1. Third, a processing and review fee was included in reference 3.

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Mr. Harold Denton  
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During our review of reference 1, we determined that plant modifications were needed to implement the TS required by the NRC Staff. We discussed the scope of the modifications with our Project Manager in a March 15 telephone call and agreed to provide, by September 15, 1984, a schedule for their completion. We also agreed that our Integrated Plan does not include the modifications in its scope, and thus, requires revision to include the additional work. We request that the NRC Staff defer their approval of the attached TS until completion of the modifications.

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.

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 19th day of March, 1984.

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

RWM/MSG/dmb\*

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92  
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. 84-0019

## EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

### Summary

The proposed changes are requested as a result of NRC review and approval of our October 13, 1975 submittal requesting certain exemptions from the requirements of 10 CFR 50.54(o) and Appendix J to 10 CFR Part 50.

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 changes do not involve a significant increase in the probability or consequences of an accident previously evaluated as they reflect wording changes which the NRC has determined to be in compliance with 10 CFR Part 50, Appendix J. In other cases, we have requested that the NRC disposition certain requests to add or delete certain valves from Type C testing requirements. The NRC evaluated our requests and determined that in certain cases our proposed changes were acceptable, and in some cases they were not acceptable. These proposed changes reflect changes which NRC has evaluated and determined to be acceptable and in compliance with the provisions of 10 CFR Part 50, Appendix J.

- (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 does not create the possibility of a new or different kind of accident as plant containment integrity will be maintained in compliance with the provisions of 10 CFR Part 50, Appendix J. The existing accident analyses described in Chapter 15 of the UFSAR remain intact with the proposed changes requested by Iowa Electric.

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

Response: There is no significant reduction in the plant margin of safety as both Iowa Electric, NRC, and NRC's subcontractor (Franklin Research Center) has found the proposed changes meet, or provide an acceptable alternative to, the requirements of 10 CFR Part 50, Appendix J.

In the April 6, 1983 Federal Register, The NRC published examples of amendments that are not likely to involve a significant hazards concern. Example number 1 and 3 are consistent with the findings of this safety evaluation in that:

- 1) This is an administrative change to technical specifications which reflects a change in nomenclature and;
- 2) The analytical methods used to demonstrate conformance with the technical specifications and regulations are not significantly changed, and by review and issuance of their Safety Evaluation Report dated January 17, 1984, the NRC has found the proposed changes acceptable.