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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
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 ROTHERT, W. C. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T. E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Application for amend to License DPR-49 consisting of
 Proposed Change RTS-217 revising current Tech Spec
 requirement re instrument setpoint for containment cooling
 sys. Fee paid.

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w/check
\$150⁰⁰
142688

Iowa Electric Light and Power Company

October 13, 1987
NG-87-3706

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

USNRC-DS
1987 OCT 20 A 9:40

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Technical Specification Change (RTS-217)
Containment Spray Setpoint
File: A-117, E-11

Dear Sir:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, we request revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

This proposed change (RTS-217) revises the current Technical Specification requirement regarding an instrument setpoint for the Containment Cooling System.

The application has been reviewed and approved by the DAEC Operations Committee and DAEC Safety Committee. In accordance with the fee schedule for license amendments (10 CFR 170), a check for \$150 is enclosed. The balance of the fee will be paid upon billing.

A copy of this submittal, which includes a no significant hazards considerations analysis, is being forwarded to our designated state official pursuant to the requirements of 10 CFR 50.91.

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PDR ADDCK 05000331
P PDR

*Acc w/check
\$150
#142688*

Mr. A. Bert Davis
October 13, 1987
NG-87-3706
Page Two

This application is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY William C. Rother
William C. Rother
Manager, Nuclear Division

Subscribed and sworn to Before Me on
this 13th day of October 1987.

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

WCR/NKP/pjv*

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92
2) Proposed Change RTS-217 including List of Affected Pages
3) Safety Analysis
4) Check No. 142688

cc: A. Bert Davis (NRC-Region III)
A. Cappucci (NRC-NRR)
NRC Resident Office
N. Peterson
L. Liu
L. Root
R. McGaughy
T. Houvenagle (UD)

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Background:

The purpose of this request (RTS-217) is to propose revision of the Duane Arnold Energy Center (DAEC) Technical Specifications (TS), Table 3.2-B, to conform with the existing Final Safety Analysis Report (FSAR), Section 6.2.1.1.2.5.

Iowa Electric Light and Power Company, Docket No. 50-331,

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request: October 13, 1987

Description of Amendment Request:

By its submittal dated October 13, 1987, the licensee, Iowa Electric Light and Power Company (IELP), has proposed a license amendment change request which will bring its Technical Specifications into conformance with its Final Safety Analysis Report (FSAR).

Table 3.2-B of the Duane Arnold Energy Center (DAEC) Technical Specifications, "Instrumentation That Initiates or Controls the Core and Containment Cooling Systems," currently states that the trip level setting for the Containment High Pressure instrument shall be between 1 and 2 psig to prevent inadvertent initiation of containment spray during accident conditions. The FSAR analysis of the Suppression Pool to Reactor Building vacuum relief system, assumes this trip level setting to be greater than 2 psig and states that the design basis transient for this system is the inadvertent initiation of containment spray while the drywell is at the maximum operating temperature (150°F).

The licensee proposes that the Containment High Pressure instrument trip level setting and remarks, stated in Table 3.2-B of the DAEC Technical Specifications, be revised to reflect the FSAR analysis.

Basis for proposed no significant hazards consideration determination: The Commission has provided standards (10 CFR 50.92(c)) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in the margin of safety.

In reviewing this proposed request for Technical Specification change we have concluded that this amendment:

- (1) does not involve a significant increase in the probability or consequences of an accident previously evaluated because this change to the Technical Specifications resolves an inconsistency in the instrument setpoint dealing with the control of the containment spray system at primary containment pressures below 2 psig. The correction does not increase the probability or consequences of an accident previously evaluated.
- (2) does not create the possibility of a new or different kind of accident because this change resolves an inconsistency in the Technical Specifications to reflect an accident that has previously been evaluated in the FSAR; thus, no possibility of a new or different kind of accident is created by this change.
- (3) does not involve a significant reduction in a margin of safety because the proposal does not change the original margin of safety.

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401

Attorney for Licensee: Jack Newman, Kathleen H. Shea, Newman and Holtzinger, 1615 L Street NW, Washington, DC 20036

PROPOSED CHANGE RTS-217 TO THE
DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend Appendix A (Technical Specifications) to said license by deleting current pages and replacing them with the attached, new pages. A list of the Affected Pages is given below.

Specification 3.2.B addresses the operability requirements for instrumentation that initiates or controls core and containment cooling systems. This specification refers to Table 3.2-B, which states that the Containment High Pressure trip level setting shall be between 1 and 2 psig. The given trip level setting is inconsistent with the Final Safety Analysis Report (FSAR) analysis of the design basis for this setpoint. The attached Technical Specification page is being revised to follow the FSAR analysis.

LIST OF AFFECTED PAGES

3.2-9

SUMMARY OF CHANGE:

The Mark I primary containment at Duane Arnold Energy Center (DAEC) is designed to withstand an external pressure not more than 2 psi greater than the concurrent internal pressure. Automatic vacuum relief devices (vacuum breakers) are used to prevent any unacceptable pressure differential between the primary and secondary containments.

According to the FSAR analysis of the vacuum relief system, the Reactor Building to torus vacuum breakers are of adequate size to prevent either the drywell or torus from exceeding their negative design pressure (-2 psig) should containment spray be inadvertently initiated above 2 psig during the worst case normal operating conditions.

To prevent inadvertent initiation of containment spray below a drywell pressure of 2 psig, the plant design includes four pressure switches that sense drywell pressure and operate an "interlock" such that the remote opening of motor operated valves MO-1902, MO-1903, MO-2000, and MO-2001 is inhibited below the 2 psig setpoint. These four valves isolate the containment spray header from the Residual Heat Removal (RHR) system.

The DAEC Technical Specifications are inconsistent with the FSAR with regard to this setpoint in that the setpoint is below the value stated in the FSAR. General Electric was asked to perform an analysis to determine the results of initiating containment spray as low as 1 psig (the lower setpoint limit specified in the current DAEC Technical Specifications) during the design worst case transient. The analysis showed that under these conditions, the design negative pressure of the primary containment would not be exceeded and therefore, the design basis was met.

RTS-217

The purpose of this change is to correct the setpoint as given in the DAEC Technical Specifications such that it will agree with the FSAR analysis. To resolve the inconsistency, we propose the Technical Specifications (Table 3.2-B) allow the pressure switches to be set to actuate at a drywell pressure of greater than 2 psig and that the remarks state "prevents inadvertent operation of containment spray during normal operation" instead of "prevents inadvertent operation of containment spray during accident condition".