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ROTHBERT,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,revising Tech Specs to comply w/ Generic Ltr 88-01 & NUREG-0313,Rev 2.

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10 CFR 50.90

Iowa Electric Light and Power Company
July 27, 1988
NG-88-1207

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

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Request for Technical Specification Change (RTS-1434A): IGSCC Augmented Inservice Inspection Requirements

References: 1) Letter from W. Rothert (Iowa Electric) to T. Murley (NRC) dated July 27, 1988 (NG-88-0973)
2) Letter from R. McGaughy (Iowa Electric) to H. Denton (NRC) dated December 21, 1983 (NG-83-3944)

File: A-117, A-286a, B-31c, SpF-118

Dear Dr. Murley:

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 of the Technical Specifications (TSs) for the Duane Arnold Energy Center (DAEC). This application for revision reflects changes to Sections 3.2.E, 3.6.C, 4.6.C and 4.6.G to ensure compliance with NRC Generic Letter 88-01 and NUREG-0313, Revision 2 as discussed in Reference 1. This proposed amendment also reflects the replacement of an interim inspection program which required ultrasonic examination of the DAEC recirculation inlet safe-end assemblies at least twice and would incorporate the beginning dates for our current 10-year Inservice Inspection and Inservice Testing programs into the Technical Specifications. The interim inspection requirement was set forth in the staff's Safety Evaluation Report (SER) for Amendment No. 49, dated March 5, 1979 and inspections required by this program will be included under the program transmitted in Reference 1.

This entire application, RTS-143A (Attachments 1 through 3), has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee and supersedes a previously submitted application, RTS-143, dated December 21, 1983. Review of RTS-143 was deferred by the staff pending issuance of NUREG-0313, Revision 2.

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No application fee is enclosed. This request is intended to replace a previously submitted change request (Reference 2), which was accompanied with a check for $4,000 pursuant to the requirements of 10 CFR 170.

Pursuant to the requirements of 10 CFR 50.91, a copy of this requested change and analysis of no significant hazards considerations is being forwarded to our appointed state official.

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

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY William C. Rothert

William C. Rothert
Manager, Nuclear Division

Subscribed and sworn to Before Me on this 27th day of July 1988.

Kathleen M. Turner

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-143A and List of Affected Pages
3) Safety Analysis

cc: N. Peterson
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
J. Eure (State of Iowa)
Commitment Control 880033

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Background:

On February 26, 1981, the NRC staff issued Generic Letter 81-04 to licensees requesting their plans for the implementation of NUREG-0313, Revision 1, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping". In this letter, the staff requested that licensees propose appropriate changes to their Technical Specifications to bring them into conformance with the report. Our proposed Technical Specification amendment was submitted on December 21, 1983 (RTS-143). Action on this amendment was deferred by the staff, pending revision of NUREG-0313. On January 25, 1988, the staff issued Generic Letter 88-01, which promulgated NUREG-0313, Revision 2. This proposed amendment is in response to Generic Letter 88-01, and supersedes the previously proposed amendment (RTS-143).

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

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request: July 27, 1988

Description of Amendment Request: The proposed license amendment would revise the Duane Arnold Energy Center (DAEC) Technical Specification Section 4.6.G to reflect the beginning dates for the current 10-year interval of our Inservice Inspection (ISI) and Inservice Testing (IST) programs, establish a TS requirement for augmented inservice inspection of piping covered under the scope of NRC Generic Letter 88-01 and NUREG-0313, Revision 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," and delete an interim requirement for an ultrasonic testing program for our recirculation system inlet nozzle safe-ends. The interim program was a result of License Amendment 49 and is no longer necessary as the inlet nozzle safe-ends will continue to be inspected at the same frequency under the scope of our augmented inservice inspection program required by Generic Letter 88-01.

The proposed changes to Technical Specification Sections 3.2.E and 3.6.C will assure that the DAEC coolant leakage detection systems are in conformance with the staff's position on leakage detection as stated in Generic Letter 88-01 and NUREG-0313, Revision 2.

This amendment also proposes to revise the bases for Sections 3.2, 3.6.C, 4.6.C, 3.6.G and 4.6.G to reflect the proposed changes and explain the commitments made in the aforementioned inservice inspection and testing programs.

Basis for proposed no significant hazards consideration determination: The Commission has provided standards (10CFR50.92(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 a 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 the proposed changes to Section 4.6.G are administrative in nature and thereby cannot increase the probability or consequences of an accident. The addition of a reference to the requirements of NRC Generic Letter 88-01 (which in turn references the requirements of NUREG-0313, Revision 2) in the surveillance requirements provides specific guidance on material selection and processing guidelines for the reactor coolant pressure boundary piping, and is an enhancement to the ISI Program.

The requirement for inspection of the recirculation system inlet safe-end assemblies is no longer necessary as these items will be inspected at the same frequency under the scope of the program required by Generic Letter 88-01.

The proposed changes to Sections 3.2.E, 3.6.C and 4.6.C will serve to clarify operability requirements of the coolant leakage detection system instrumentation, reduce the allowed out-of-service time for the coolant leakage sump system and provide more conservative coolant leakage limits. These changes are necessary to meet the guidelines set forth in Generic Letter 88-01 and will provide additional conservatism in the Technical Specifications. This will furnish added assurance that any structural degradation of the reactor coolant pressure boundary (RCPB) will be detected on a timely basis so that corrective actions can be made before such degradation can become sufficiently severe to jeopardize the integrity of the RCPB.

Therefore, addition of these surveillance requirements does not increase the probability of occurrence or consequences of any event previously evaluated in the DAEC Final Safety Analysis Report (FSAR).

(2) does not create the possibility of a new or different kind of accident because the proposed changes have no impact on the physical configuration or operating procedures of the DAEC. These changes impact only the administration of the ISI Program, clarify operability requirements of the coolant leakage detection systems, provide more conservative leakage limits and reduce the allowed out-of-service time of the coolant leakage detection systems. Therefore, the proposed changes are not deemed to create the possibility of a new or different kind of accident from any accident previously evaluated in the DAEC FSAR.

(3) does not involve a significant reduction in the margin of safety because the proposed changes to section 4.6.G are administrative in nature and do not affect the margin of safety. As stated in the bases of Technical Specification 3.6.G and 4.6.G:

> "The program was established to provide reasonable assurance that no LOCA would occur at the DAEC as a result of leakage or breach of pressure-containing components and piping of the reactor coolant system, portions of the ECCS, and portions of the reactor coolant associated auxiliary systems."

The requirements for augmented inservice inspections of piping covered under the scope of Generic Letter 88-01 are an enhancement to the ISI program and performance of the required inspections will not reduce the margin of safety as defined in the Technical Specification bases.

The bases for Technical Specification 3.6.C state:

> "Leakage less than the magnitude specified can be detected reasonably in a matter of a few hours utilizing the available leakage detection schemes, and if the origin cannot be determined in a reasonably short time the plant should be shut down to allow further investigation and corrective action."

Reducing the allowed out-of-service time for the coolant leakage sump system and providing more conservative coolant leakage limits will not degrade the ability of the DAEC to detect leakage and thus, will not reduce the margin of safety as defined in the Technical Specification bases.

The proposed administrative changes will not increase the probability or the consequences of any previously analyzed accident, introduce any new or different kind of accident, or reduce the existing margin of safety.

Therefore, this proposed license amendment is judged to involve no significant hazards consideration.

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

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

PROPOSED CHANGE RTS-143A 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.

LIST OF AFFECTED PAGES

3.2-20

3.2-45

3.6-5

3.6-8

3.6-9

3.6-25

3.6-26

3.6-36

3.6-37

Summary of Changes:

The following list of proposed changes is in the order that the changes appear in the Technical Specifications.

Page(s)	Description of Change
3.2-20	Revises Table 3.2-E of the Technical Specifications (TSs) to state the minimum operability requirements of the instrumentation associated with the Sump and Air Sampling Systems. Also, the number of instrument channels provided by design is specified for each of the systems.
3.2-45	Revises the bases for Specification 3.2 to state that the Air Sampling System is provided as a backup system to the Sump System to detect primary coolant leakage.

3.6-5	Revises TSs 3.6.C and 4.6.C to correspond with the Staff position on leakage detection systems as set forth in NRC Generic Letter 88-01. A new limit is added to the TS: if there is a 2gpm increase in unidentified leakage within 24 hours the plant must be taken to cold shutdown within 24 hours. The permissible period of operation with an inoperable sump system is reduced to 24 hours (rather than 7 days). In addition, an editorial footnote referring to the conversion from annual to 18 month operating cycles is no longer necessary and has been deleted.
3.6-8	Revises TSs 4.6.G.1 and 4.6.G.2 to specify the beginning dates for the present Inservice Inspection (ISI) and Inservice Testing (IST) programs at the DAEC. This change also deletes the existing TS 4.6.G.3, which previously specified the beginning dates for the first 10-year interval for the ISI and IST programs.
3.6-9	Add a requirement (TS 4.6.G.3) to implement an augmented ISI program in accordance with Generic Letter 88-01 and NUREG-0313, Revision 2. Also, TS 4.6.G.4, which required an interim augmented ISI program for the recirculation system inlet nozzle safe-ends is deleted. This program has been completed and future inspection of these components will fall under the scope of our program required by NRC Generic Letter 88-01.
3.6-25 and 3.6-26	Revises the bases for TS 3.6.C and 4.6.C to reflect the proposed changes to the coolant leakage detection system. Changes include adding a reference to the UFSAR definitions of unidentified and identified leakage, providing a basis for procedurally establishing a 4 hour leakage rate determination, and providing a basis for operablity requirements and limitations of the leakage detection systems.
3.6-36 and 3.6-37	Revises the bases for TS 3.6.G and 4.6.G to reflect the proposed changes and better clarify the commitments made in the present ISI and IST programs, and our response to Generic Letter 88-01.