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 MINECK,D.L. 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,removing 3.25 limit  
 on extending surveillance intervals.

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Iowa Electric Light and Power Company  
February 28, 1990

NG-90-0162

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Request for Technical Specification Change (RTS-234)  
"Removal of the 3.25 Limit on Extending Surveillance  
Intervals"  
File: A-117, A-101b, A-289g

Dear Dr. Murley:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, we request revision of the Technical Specifications for the Duane Arnold Energy Center (DAEC). The purpose of the proposed change (RTS-234) is to remove the 3.25 limit on extending surveillance intervals, as suggested in Generic Letter 89-14, "Removal of the 3.25 Limit on Extending Surveillance Intervals."

This application (proposed change RTS-234) has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. Pursuant to the requirements of 10 CFR 50.91, a copy of this submittal, including the no significant hazards considerations analysis is being forwarded to our appointed state official.

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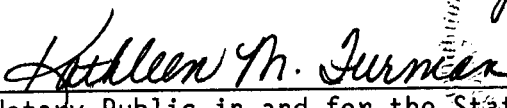
Dr. Thomas E. Murley  
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This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By   
DANIEL L. MINECK  
Manager, Nuclear Division

Subscribed and sworn to before me on  
this 28<sup>th</sup> day of February, 1990.

  
Notary Public in and for the State of Iowa

DLM/SRC/pjv+

Attachments: 1) Evaluation of Change with Respect to 10 CFR 50.92  
2) Proposed Change RTS-234 including List of Affected Pages

cc: S. Catron  
L. Liu  
L. Root  
R. McGaughy  
J. R. Hall (NRC-NRR)  
A. Bert Davis (Region III)  
J. Eure (State of Iowa)  
NRC Resident Office  
Commitment Control No. 890341

## EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Background:

On August 21, 1989, the NRC issued Generic Letter 89-14, "Line Item Improvements In Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals." This letter provides guidance for submittal of license amendments to remove from Technical Specifications the limit on extending consecutive surveillance intervals. In the generic letter, the NRC staff concluded that removal of the limit on combined time interval for three consecutive surveillance intervals poses a low risk to safety in contrast to the alternative of a forced plant shutdown to perform certain surveillances. The purpose of this proposed amendment request is to remove the 3.25 limit on extending surveillance intervals from the Duane Arnold Energy Center (DAEC) Technical Specifications consistent with the recommendations of NRC Generic Letter 89-14.

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

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request: February 28, 1990

Description of Amendment Request:

By its submittal dated February 28, 1990, Iowa Electric Light and Power (IELP) has proposed a license amendment which removes the limitation on extending consecutive surveillance intervals from the DAEC Technical

Specifications. This proposed amendment is submitted in accordance with guidance provided in NRC Generic Letter 89-14. Changes are made to Technical Specifications Section 1.0, entitled "Definitions."

Removal of the 3.25 limit on extending surveillance intervals implements an improvement recommended by the NRC in Generic Letter 89-14. This change was approved by the NRC for the LaSalle Plant on a lead plant basis on July 19, 1989.

Basis for proposed no significant hazards consideration determination:

The Commission has provided standards (10CFR 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 a margin of safety.

In reviewing this proposed request for Technical Specification change, we have reached these conclusions:

- 1) The proposed amendment does not involve an increase in the probability or consequences of an accident previously evaluated. The change being proposed is administrative in nature and does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant. The DAEC Technical Specifications provide allowance for extending surveillance intervals by 25% to preclude the

need for performing surveillances when plant conditions are not suitable. The removal of the 3.25 limit on extending successive surveillance intervals presents a small risk in contrast to the alternative of a forced shutdown or performance during unsuitable plant conditions. The 3.25 limit on consecutive surveillance intervals was merely an administrative limit to preclude abuse of the provision for extension. (A clarifying note is being added to the DAEC Technical Specifications to discourage repeated use of the 25% extension allowance.) Removal of the 3.25 limit will provide greater flexibility to perform surveillances under plant conditions more suitable for the surveillances.

- 2) The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The allowance for extending surveillance intervals by up to 25 percent previously existed. The removal of the limitation on consecutive surveillance interval extensions will alleviate an administrative burden and allow a more flexible schedule for performing surveillances under favorable plant conditions.
- 3) The proposed amendment does not involve a reduction in the margin of safety. Existing surveillances remain unchanged. The ability to extend surveillance intervals by as much as 25 percent previously existed. The removal of the 3.25 limit will result in a significant safety benefit by allowing postponement of surveillances within the 25% allowance when the existing 3.25 rule would have required a plant shutdown or performance of a surveillance during plant conditions which would not be conducive to performing these surveillances.

The proposed amendment, having been evaluated against the requirements of 10 CFR 50.92, is determined to involve no significant hazards consideration.

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