

Iowa Electric Light and Power Company

February 26, 1990

NG-90-0411

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-230A), "Organizational Changes"
Reference: Letter, D. Mineck to Dr. T. Murley, NG-89-2689,
dated November 3, 1989
File: A-117, A-202

Dear Dr. Murley:

In the referenced letter, we proposed to make certain changes in the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed changes were prepared in accordance with the guidelines in Generic Letter 88-06 and were intended to allow us to make changes in our organizational structure under the provisions of 10 CFR Part 50.59.

We have subsequently determined that our currently-proposed reorganization of the Iowa Electric Light and Power Company Nuclear Generation Division will require several additional changes in the TS. Consequently, we propose to supplement our earlier application with the attached, additional pages. One of the attached pages, 6.3-1, is intended to supersede that page which was previously submitted. The requested changes in position titles are administrative in nature and affect many plant procedures. We therefore request that the implementation period for incorporating these changes into DAEC procedures be extended from the normal 30 day period to be 24 months after the date of issuance of the amendment. This will allow us to make these changes during the routine procedure revision process, rather than as a large, dedicated effort solely for the purpose of changing position titles.

A separate determination of No Significant Hazards Consideration, pursuant to 10 CFR Part 50.92, has been prepared for these additional changes and is also attached.

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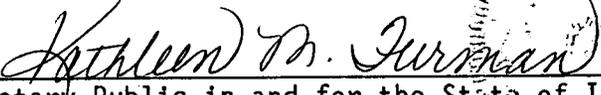
This application has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. Pursuant to the requirements of 10 CFR 50.91, a copy of this submittal, including the determination of No Significant Hazards Consideration, is being forwarded to our appointed state official.

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

IOWA ELECTRIC LIGHT AND POWER COMPANY

By 
DANIEL L. MINECK
Manager, Nuclear Division

Subscribed and sworn to before me on
this 26th day of February, 1990.


Notary Public in and for the State of Iowa

DLM/RAB/pjv+

Attachments: 1) Evaluation of Change with Respect to 10CFR50.92
2) Proposed Change RTS-230A including List of Affected Pages

cc: T. Browning
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRC-NRR)
A. Bert Davis (Region III)
J. Eure (State of Iowa)
NRC Resident Office

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Background:

In its application dated November 3, 1989, Iowa Electric Light and Power Company (IELP) proposed to modify the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC) pursuant to the guidelines of NRC Generic Letter 88-06, Removal of Organization Charts from Technical Specification Administrative Control Requirements, to eliminate the organizational chart from the Administrative Control section of the TS. Subsequent to that submittal, IELP has identified other TS changes which are necessary to support a general reorganization of the Nuclear Generation Division. This reorganization has been described to the NRC in several management meetings.

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

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request: February 26, 1990

Description of Amendment Request:

In its previous submittal (RTS-230) dated November 3, 1989, IELP requested various changes to the Administrative Control section of the TS which deals with organizational structure. That application was prepared using the guidance contained in NRC Generic Letter 88-06. After that submittal,

IELP proposed to revise the organizational structure of its Nuclear Generation Division, necessitating additional changes to the TS. This application (RTS-230A) dated February 26, 1990, modifies our earlier submittal to include the additional changes. Specifically, certain department supervisor titles have been changed to reflect their functional responsibilities more precisely, lines of responsibility have been strengthened and clarified, and positions have been eliminated to improve communication channels and management involvement. IELP has evaluated these additional changes and has determined that they meet the guidance of Generic Letter 88-06 and satisfy the acceptance requirements of the Standard Review Plan (SRP) Chapter 13.1 for organizational structure, i.e., ensuring that primary responsibilities are clearly defined, adequate resources are allocated, lines of authority and communication are not ambiguous and certain functional areas (e.g., Radiation Protection, Quality Assurance and Training) are sufficiently independent from operating pressures.

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 a margin of safety.

We have reviewed the additional TS revisions requested by this submittal and reached these conclusions:

- 1) The proposed changes to the organizational structure will not directly affect the physical design and or operation of the plant, do not conflict with assumptions made in the plant safety analysis, and do not reduce any previous commitments regarding organizational structure, technical support of plant operations or training and experience of personnel. Thus, the proposed changes will not involve a significant increase in the probability or consequence of an accident previously evaluated.
- 2) The proposed changes to the organizational structure will not directly affect the physical design and/or operation of the plant or reduce our commitment to providing the necessary level of management control, allocation of resources and technical support for the safe operation of the facility. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from those previously evaluated.
- 3) The proposed changes to the organizational structure have been evaluated against the requirements of SRP Chapter 13.1, 10 CFR Part 50.36, 10 CFR Part 50, Appendix B and Generic Letter 88-06 and found to meet these requirements for ensuring adequate management and

administrative control over the operation of the facility. Thus, the proposed changes will not significantly reduce the margin of safety previously established.

Based on the above, we conclude that the Amendment does not involve a significant hazards consideration.

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First Street SE, Cedar Rapids, Iowa 52401

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PROPOSED CHANGE RTS-230A 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. The List of Affected Pages is given below.

The attached Technical Specification pages are being revised to describe changes in title and responsibility of certain managers/supervisors which are being made to support a general reorganization of the IELP Nuclear Generation Division.

LIST OF AFFECTED PAGES

6.1-1
6.3-1
6.4-1
6.5-1
6.9-1

Summary of Changes

The following list of proposed changes is in their order of occurrence in the Technical Specifications.

<u>Page</u>	<u>Description of Change</u>
6.1-1	Revise Section 6.1.3 to state that the Manager, Corporate Quality Assurance has the overall responsibility for the quality assurance function at the DAEC. This change is a clarification of the existing level of management oversight of this function.
6.3-1	Delete the title of Assistant Operations Supervisor from the previously-proposed (RTS-230) Section 6.3.5 because this position is being converted to a plant staff position.
6.4.1	Revise Section 6.4.1 to state that the training program will meet the requirements of ANSI/ANS 3.1-1978. This change is to ensure consistency with similar changes on other pages contained in the original submittal (RTS-230).
	Revise Section 6.4.2 to state that the Manager, Training, a Corporate position, has primary responsibility for the fire

brigade training program. This change is to achieve consistency between the TS and our commitments in the DAEC Fire Plan and to further separate the training function from the plant organization.

- 6.5-1 Revise Section 6.5.1.2 to change the title of the Plant Performance Department to Reactor Performance; change the title of the Assistant Plant Superintendent-Operations to Assistant Plant Superintendent-Operations and Maintenance. These changes are administrative in nature and are being made to reflect more accurately the functional responsibilities of these departments and supervisors.

- 6.9-1 Revise Section 6.9.3 to correct the title of the Operations Shift Supervisor from the old title of Shift Supervisor Engineer.