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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: Request for OL Amend RTS-242 to License DPR-49, moving component list from Section 3.7 of TS, per guidelines in Generic Ltr 91-08, "Removal of Component Lists from TS" into administrative controls section of TS.

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Iowa Electric Light and Power Company

September 20, 1991

NG-91-2762

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 Operating License Amendment  
(RTS-242) "Removal of Containment  
Component Lists"

Reference: NRC GL 91-08  
File: A-117

Dear Dr. Murley:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, Iowa Electric Light and Power Company hereby requests revision of Operating License DPR-49 for the Duane Arnold Energy Center (DAEC).

The proposed change will remove the component lists from Section 3.7 of the DAEC Technical Specifications (TS) within the guidelines set forth in NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications." The subject lists will be incorporated into DAEC Administrative Control Procedures which are subject to the change control provisions described in the Administrative Controls Section of the TS. Approval of this amendment is needed prior to startup from the upcoming refueling outage, currently scheduled to begin February 28, 1992.

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 no significant hazards consideration analysis is being forwarded to our appointed state official.

Should you have any questions regarding this matter, please contact this office.


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Dr. Thomas E. Murley  
September 20, 1991  
NG-91-2762  
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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

State of Iowa  
(County) of Linn

Signed and sworn to before me on this 20th day of September,  
1991, by Daniel L. Mineck.

  
Notary Public in and for the State of Iowa

September 28, 1992  
Commission Expires

- Attachments: 1) Proposed Change RTS-242 to the Duane Arnold Energy  
Center Technical Specifications  
2) Evaluation of Change with respect to 10 CFR 50.92  
3) Safety Assessment

DLM/GTK/pjv

cc: G. Kaegi  
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NRC Resident Office

PROPOSED CHANGE RTS-242 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 the current pages and replacing them with the attached, new pages. The List of Affected Pages is given below.

List of Affected Pages

vi	3.7-19	3.7-27
3.2-36a	3.7-20	3.7-28
3.2-38	3.7-21	3.7-29
3.2-39	3.7-22	3.7-29a
3.7-2	3.7-23	3.7-38
3.7-5	3.7-23a	3.7-47
3.7-6	3.7-24	3.7-48
3.7-7	3.7-25	
3.7-18	3.7-26	

Summary of Changes:

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

<u>Page</u>	<u>Description of Changes</u>
vi	Tables 3.7-1, 3.7-2 and 3.7-3 are being deleted from this list of tables.
3.2-36a	References to Specification 3.7 and Table 3.7-3 are being deleted.
3.2-38	Reference to Specification 3.7 for Isolation Valve Closure Group is being deleted.
3.2-39	Reference to Specification 3.7 for Valve Group is being deleted.
3.7-2	3.7.A.2 is being modified to refer to 3.7.D.2 to eliminate any inconsistency between the two subsections.
3.7-5	References to Tables 3.7-1 and 3.7-2 are being removed from the Type B and Type C surveillance subsections.
3.7-6	The one time exemption footnote is being removed as an editorial change. The exemption has expired and is no longer needed.

- 3.7-7 Subsection (e) is being modified to include a reference to the surveillance on the mechanical limiter. This originally existed as a footnote to Table 3.7-2. Subsection (f) requires a period rather than a parenthesis and is being updated as an editorial change. The one time exemption footnote is being removed as an editorial change. The exemption has expired and is no longer needed.
- 3.7-18 The LCO subsection 3.7.D.1 is being changed to remove the reference to Table 3.7-3. The surveillance subsection 4.7.D.1.b.1) is being modified to remove the reference to Table 3.7-3. The footnote relating back to the definition of operating cycle is being removed as the definition of operating cycle is clear in TS Section 1.0. Also, footnotes are being added which had originally existed on Table 3.7-3.
- 3.7-19 The LCO subsection 3.7.D.2 is being changed to remove any references to Table 3.7-3.
- 3.7-20 Table 3.7-1 is being deleted.
- 3.7-21 Table 3.7-1 (Continued) is being deleted.
- 3.7-22 Table 3.7-2 is being deleted.
- 3.7-23 Table 3.7-2 (Continued) is being deleted.
- 3.7-23a Table 3.7-2 (Continued) is being deleted.
- 3.7-24 Notes for Table 3.7-2 are being deleted.
- 3.7-25 Table 3.7-3 is being deleted.
- 3.7-26 Table 3.7-3 (Continued) is being deleted.
- 3.7-27 Notes for Table 3.7-3 are being deleted.
- 3.7-28 Notes for Table 3.7-3 are being deleted.
- 3.7-29 Notes for Table 3.7-3 are being deleted.
- 3.7-29a The key for Table 3.7-3 is being deleted.
- 3.7-38 Per NRC Generic Letter 91-08, a reference to the plant Administrative Control Procedures is being added to annotate where the list of testable components can be found.
- 3.7-47 A minor editorial change was made to add a period at the end of a sentence. Per NRC Generic Letter 91-08, a reference to the plant Administrative Control Procedures is being added to annotate where the list of primary containment power operated isolation valves is located.

3.7-48      Per NRC Generic Letter 91-08, the acceptable administrative control for opening locked or sealed closed containment isolation valves is being added to the bases.