

PROPOSED CHANGE RTS-245 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 a current page and replacing it with the attached new page. The List of Affected Pages is given below.

List of Affected Pages

3.5-10

Summary of Changes:

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

Description of Changes

1. An editorial change is made in 3.5.G.3 to capitalize REFUEL to make it consistent with other sections.
2. The conditional surveillance requirements in section 4.5.G.1 for the operable diesel generator are changed from "within eight (8) hours and daily thereafter" to "within the first 24 hours and every subsequent 72 hours thereafter".

LIMITING CONDITIONS FOR OPERATIONG. Minimum Low Pressure Cooling and Diesel Generator Availability

1. During any period when one diesel generator is inoperable, continued reactor operation is permissible only during the succeeding seven days unless such diesel generator is sooner made OPERABLE, provided that the remaining diesel generator and all low pressure core and containment cooling subsystems supported by the OPERABLE diesel generator are OPERABLE. If this requirement cannot be met, an orderly SHUTDOWN shall be initiated and the reactor shall be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
2. Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining OPERABLE components to fulfill the cooling functions.
3. When irradiated fuel is in the reactor vessel and the reactor is in the COLD SHUTDOWN Condition or REFUEL Mode:
 - a. If no work is being performed which has the potential for draining the reactor vessel, both core spray and RHR systems may be inoperable; or
 - b. If work is being performed which has the potential for draining the reactor vessel, at least two of any combination of core spray and/or RHR (LPCI or shutdown cooling mode) pumps shall be OPERABLE (including the capability to inject water into the reactor vessel with suction from the suppression pool) except as

SURVEILLANCE REQUIREMENTSG. Minimum Low Pressure Cooling and Diesel Generator Availability

1. When it is determined that one diesel generator is inoperable, the remaining diesel generator shall be demonstrated to be OPERABLE within the first 24 hours and every subsequent 72 hours thereafter. In addition, all low pressure core cooling and containment cooling subsystems supported by the OPERABLE diesel shall be verified to be OPERABLE.

SAFETY ASSESSMENT

1. INTRODUCTION

By letter dated May 28, 1992, Iowa Electric Light and Power Company requests revision to the Duane Arnold Energy Center (DAEC) Technical Specifications (TS). The proposed revision will modify the surveillance requirements of 4.5.G such that when one diesel generator is determined to be inoperable, the other diesel generator must be demonstrated to be operable within the first 24 hours and every subsequent 72 hours thereafter.

2. EVALUATION

The DAEC TS currently require that when one diesel generator is declared inoperable, the remaining diesel generator must be demonstrated to be operable within eight (8) hours and daily thereafter.

The proposed revision of the DAEC TS would change the conditional surveillance requirement to demonstrate the remaining diesel generator operable within the first 24 hours and every subsequent 72 hours thereafter. Testing diesel generators to prove operability can cause accelerated wear and shorten equipment life. In this case, testing requires connecting the remaining operable standby diesel generator to the offsite power source for which it is designed to serve as the backup. This places the diesel generator in a "less-than-desirable" condition, since it exposes the diesel generator and offsite power source to a common mode failure. Decreasing the amount of testing required will serve to minimize wear-related degradation and increase overall diesel generator reliability and readiness.

Based on the above information, we conclude that this proposed request is acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criteria for determining that a proposed licensing and regulatory action falls within a categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (3) result in an increase in individual or cumulative occupational radiation exposure. Iowa Electric Light and Power has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Attachment 1, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment reduces the amount of diesel generator testing required when one diesel generator is inoperable. It does not result in a change in the types or amounts of any effluents that may be released offsite.
3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. Radiation exposure to individuals working within the plant would be lowered because less time will be spent in the plant for testing. Radiation exposure to the general public would not be affected.