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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH. NAME: MCGAUGHY, R.W. AUTHOR AFFILIATION: Iowa Electric Light & Power Co.
 RECIP. NAME: DENTON, H. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-49, consisting of proposed Change RTS-184, changing Tech Specs to ensure automatic depressurization sys accumulators meet requirements of NUREG-0737, Item II.K.3.28. Fee paid.

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Iowa Electric Light and Power Company

July 18, 1985
NG-85-3222

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
ADS Nitrogen Accumulators
Technical Specification Change
File: A-117a

Dear Mr. Denton:

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 to the Technical Specifications for the Duane Arnold Energy Center.

The proposed change is being made to ensure Automatic Depressurization System (ADS) actuation five times, 100 days post LOCA, as specified in NUREG-0737 Item II.K.3.28 (Qualification of ADS Accumulators).

This application, proposed change RTS-184, has been reviewed by both our DAEC Safety Committee and DAEC Operations Committee. Per the revised fee schedule for license amendments (10 CFR 170), a check for \$150 is enclosed. The balance of the application fee will be paid upon billing.

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

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Mr. Harold Denton
July 18, 1985
NG-85-3222
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This application, which consists of three signed originals and 37 copies with their enclosures, is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY

Richard W. McGaughey

Richard W. McGaughey

Manager, Nuclear Division

Subscribed and sworn to Before Me on
this 18th day of July 1985.



Eileen M. Barber
Notary Public in and for the State of Iowa

- Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92
2) Proposed Change RTS-184 Including List of Affected Pages

RWM/SAR/ta*

cc: S. Reith
L. Liu
S. Tuthill
M. Thadani
NRC Resident Office
T. Houvenagle (ICC)

PROPOSED CHANGE RTS-184 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. A List of Affected Pages is given below.

To meet the requirements of NUREG-0737, Item II.K.3.28, Qualification of Automatic Depressurization System (ADS) Accumulators, the Duane Arnold Energy Center (DAEC) is replacing the existing hard seated check valves in the nitrogen supply line to the ADS accumulators with soft seated check valves. These new check valves will ensure that the Automatic Depressurization System is capable of 5 actuations 100 days post LOCA.

The changes made to DAEC Technical Specifications are the inclusion of a description of the ADS Nitrogen Supply System in Bases 3.5 and the addition of a surveillance testing requirement for the leak testing of the ADS Nitrogen Accumulator Check Valves.

This proposed change will also correct an error found in Table 3.2-B. Currently, the Auto Blowdown Timer Trip Level Setting is listed as 120 sec + sec; this should read 120 sec +5sec. The 5 had been inadvertently deleted in a previous submittal.

LIST OF AFFECTED PAGES

3.2-11
3.5-9
3.5-22

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Summary

To meet the requirements of NUREG-0737, Item II.K.3.28, Qualification of ADS Accumulators, Iowa Electric will replace the current ADS accumulator check valves with valves possessing improved leakage characteristics. This application, RTS-184, is proposed to incorporate a surveillance requirement for leak testing the ADS nitrogen accumulator check valves once per operating cycle. The bases of Section 3.5 will also be modified to include a description of the requirements for the ADS nitrogen supply. This proposed change also corrects an error found in Technical Specifications Table 3.2-B.

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based upon the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response:

Incorporating a surveillance requirement into the DAEC Technical Specifications does not involve an increase in the probability or consequences of an accident previously evaluated. The surveillance requirement for the check valves to the ADS nitrogen accumulators will ensure that ADS is capable of 5 actuations 100 days post LOCA. The addition of the ADS nitrogen supply system to Bases 3.5 and the correction in Table 3.2-B are administrative changes and do not increase the probability or consequences of an accident previously evaluated.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

Since the proposed testing must be performed during a plant outage with the reactor in the cold shutdown condition, and it will not affect any system required to be operable at that time, the possibility of an accident or malfunction of a different type than previously evaluated has not been created. As stated above, the remaining changes are administrative and, as such, will not create the possibility of a different type of accident.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

This modification does not degrade this safety system or affect the operation of any other safety system. Currently, the UFSAR requires the ADS to be capable of 5 actuations after a 5-hour post LOCA period. Requiring a periodic leak testing of the ADS nitrogen supply system will increase the margin of safety for the ADS system by ensuring the system is capable of 5 actuations 100 days post LOCA.

(2)

In the April 6, 1983 Federal Register, the NRC published a list of examples of amendments that are not likely to involve a significant hazards concern. Example numbers i and ii of that list state:

- (i) A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

and

- (ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications: for example, a more stringent surveillance requirement.

Since this change adds an additional control and corrects an error, the above examples are judged to apply. Therefore, the enclosed application is judged to involve no significant hazards.