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

SUBJECT: Application for amend to License DPR-49, consisting of
 Proposed Change: RTS-190, revising supervisory relationship
 between site & offsite mgt.

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Iowa Electric Light and Power Company

September 24, 1985
NG-85-4059

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
Technical Specification Change (RTS-190)
Plant Staffing Changes
File: A-117, A-202

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 (TS) for the Duane Arnold Energy Center (DAEC).

This proposal rearranges a portion of the DAEC Plant Staffing and makes changes to the supervisory relationship between the DAEC site management and the off-site Nuclear Generation management. Several other minor administrative changes are also included. This proposed change is purely administrative in nature and involves no physical change to the plant.

This application, proposed change RTS-190, has been reviewed by both our DAEC Operations Committee and DAEC Safety Committee. Per the fee schedule for license amendments (10 CFR 170), a check for \$150 is enclosed. The balance of the 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.

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. McGaughy
Richard W. McGaughy
Manager, Nuclear Division

Subscribed and sworn to Before Me on
this 25th day of September 1985.

Kathleen M. Furner
Notary Public in and for the State of Iowa

B509300149 B50924
PDR ADDCK 05000331
P PDR

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92
2) Proposed Change RTS-190 including List of Affected Pages

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

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EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Summary

This proposal rearranges a portion of the DAEC Plant Staffing and makes changes to the supervisory relationship between the DAEC site management and the off-site Nuclear Generation management. This proposed change is purely administrative in nature and involves no physical change to the plant.

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:

No. This change is purely administrative in nature and is being made to partially reorganize plant staffing.

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

Response:

No. As stated above, this change is strictly administrative and therefore does not create the possibility of a new or different kind of accident.

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

Response:

No. This change is purely administrative and includes no physical change to the plant. There is, therefore, no reduction in the margin of safety.

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 number one of that list states:

"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."

This application is judged to fall into this category. The enclosed application is, therefore, judged to involve no significant hazards.

PROPOSED CHANGE RTS-190 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.

Summary

This Technical Specification change proposal consists of two major changes. The first change rearranges a portion of the DAEC Plant Staffing as shown on the staffing chart in Figure 6.2-1 on page 6.2-4. The second change will change the supervisory relationship between the DAEC site management and the off-site Nuclear Generation management.

In the first change, the position of Assistant Plant Superintendent-Technical Support will be eliminated. This position will be separated into two positions - the Plant Services Supervisor and the Technical Services Superintendent. The Support Services Supervisor and the Support Services Personnel will now come under the direction of the Plant Services Supervisor. The Technical Support Supervisor, the Plant Performance Supervisor and their engineers will be under the direction of the Technical Services Superintendent, who will report directly to the Plant Superintendent-Nuclear. The position of Technical Services Superintendent may be utilized to fulfill the license requirements of ANSI N.18.1-1971 and is therefore noted with two asterisks in Figure 6.2-1. The two-asterisk note is reworded to clarify which positions may be used to meet the requirements of ANSI N18.1-1971. This separation of supervision into the areas of Plant Services and Technical Services should enhance the overall efficiency and effectiveness of the plant staffing. Also, in the plant staffing chart, Figure 6.2-1, the acronym for Senior Licensed Operator (SLO) is being changed to SRO, which stands for Senior Reactor Operator. This will eliminate the confusion between this acronym and the acronym for Single Loop Operation (SLO).

The second change is that the Plant Superintendent-Nuclear will now report to the Manager-Nuclear Division instead of Director-Nuclear Generation. The related plant reporting activities will now also be directed to the Manager-Nuclear Division. This change will reduce communication time and levelize the overall work load between the Manager-Nuclear Division and the Director-Nuclear Generation.

The following list of proposed changes is in the order that the changes appear in the Technical Specifications. The List of Affected Pages is presented following this list of changes.

- (1) On page 6.1-1, item 6.1.1 is changed to show that the Plant Superintendent-Nuclear will now report to the Manager-Nuclear Division instead of the Director-Nuclear Generation.
- (2) On page 6.1-1, item 6.1.2 is changed to show that the overall responsibility for the DAEC fire protection program is now assigned to the Manager-Nuclear Division instead of the Director-Nuclear Generation.
- (3) On pages 6.2-1 and 6.2-3, SLO and Senior Licensed Operator are replaced with SRO and Senior Reactor Operator wherever they appear. LO and Licensed Operator are replaced with RO and Reactor Operator.

- (4) On page 6.2-4, the DAEC Nuclear Plant Staffing chart is modified to reflect the site organization changes and the acronym changes as described in the above summary.
- (5) On page 6.2-4, the two-asterisk note is reworded to clarify which positions may be used to meet the requirements of ANSI N18.1-1971.
- (6) On page 6.5-1, item 6.5.1.2 is reworded to reflect the effects of the staffing chart changes on the composition of the Operations Committee.
- (7) On page 6.5-3, item 6.5.1.6.e. is changed to show that the reports on the investigation of all violations of the Technical Specifications shall now be forwarded to the Manager-Nuclear Division instead of the Director-Nuclear Generation.
- (8) On page 6.5-4, item 6.5.1.7.c. is changed to show that notification shall now be provided to the Manager-Nuclear Division instead of the Director-Nuclear Generation.
- (9) On page 6.5-4, item 6.5.1.8 is changed to show that the Operations Committee meeting minutes shall now be provided to the Manager-Nuclear Division instead of the Director-Nuclear Generation.
- (10) On page 6.6-1, item 6.6.1.a is changed to show that Reportable Events shall be reviewed and reported to the Manager-Nuclear Division instead of the Director-Nuclear Generation.
- (11) On page 6.7-1, items 6.7.2 and 6.7.3 are changed to show that the reporting activities will now be handled by the Manager-Nuclear Division instead of the Director-Nuclear Generation.

LIST OF AFFECTED PAGES

6.1-1
6.2-1
6.2-3
6.2-4
6.5-1
6.5-3
6.5-4
6.6-1
6.7-1