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SUBJECT: Submits addl info requested for review of proposed Tech Spec Change RTS-203. Change will add normal-range radiation monitor of new low level radwaste processing & storage facility to list of monitors in Tech Specs.

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Iowa Electric Light and Power Company

June 27, 1986
NG-86-2055

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-203)
Low-Level Radwaste Processing and Storage Facility (LLRPSF)
File: A-117, V-10

Dear Mr. Denton:

This letter provides additional information requested by one of your staff members reviewing proposed Technical Specification Change RTS-203. This change will add to the list of radiation monitors in the Technical Specifications the normal range radiation monitor located in the ventilation exhaust stack of the new Low-Level Radwaste Processing and Storage Facility (LLRPSF) at the DAEC.

The LLRPSF is being built in accordance with IE Circular No. 80-18 and Generic Letter 81-38. Its construction without prior NRC approval is permitted under 10 CFR 50.59 since the changes made in the facility involve neither a change in the Technical Specifications nor an unreviewed safety question. Engineering work on the LLRPSF began in the summer of 1984 and construction started in April of 1985. At that time, we believed that access to existing low-level waste burial sites would end on January 1, 1986. It was, therefore, necessary to proceed expeditiously with design and construction of the LLRPSF in accordance with published NRC guidelines.

Subsequently, we realized that use of the LLRPSF would require a change in Section 3.15 of the Technical Specifications, which lists all effluent radiation monitors installed pursuant to Section 50.34a, to assure compliance with 10 CFR 50.36a(a)(1). Section 3.15 had been added to the Technical Specifications as part of the Appendix I changes and became effective on January 1, 1986. Thus, in our view, construction of the LLRPSF is authorized under 10 CFR 50.59 but we will not declare it operational until the radiation monitor in the ventilation exhaust stack is listed in the DAEC Technical Specifications.

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The LLRPSF will employ the same basic waste handling and packaging technics that are presently used at the DAEC. The new LLRPSF does not involve any safety-related equipment nor does it increase the amount of waste generated at the DAEC. This change is conservative in nature because it implements an additional control at DAEC and has no potential to adversely affect the health or safety of the public.

Very truly yours,

R. W. McGaughy

Richard W. McGaughy
Manager, Nuclear Division

RWM/MJM/dmb*

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