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MCGAUGHY, R. W. Iowa Electric Light & Power Co.
RECIP. NAME RECIPIENT AFFILIATION
DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Application for amend to License DPR-49, revising Tech Specs to allow standby gas treatment sys tests to be performed in flowrate range of 3600-4000 cubic ft per min. Fee paid.

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Iowa Electric Light and Power Company

November 26, 1986
NG-86-1399

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-198)
Standby Gas Treatment System
File: A-117

Dear Mr. Denton:

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

The proposed change will revise the testing requirements for the Standby Gas Treatment System (SGTS). This change will allow the SGTS tests to be performed in the flowrate range of 3600-4000 CFM. This is consistent with Standard Technical Specifications.

The application (proposed change RTS-198) has been reviewed by the DAEC Operations Committee and DAEC Safety Committee. In accordance with 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, including the no significant hazards considerations analysis, is being forwarded to our appointed state official.

Add w/check $150 # 111116 1/1

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 26th day of November 1986.

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

RWM/EFB/ta*

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92
2) Proposed Change RTS-198 including List of Affected Pages

cc: E. Borton
L. Liu
L. Root
B. Gilbert
J. Keppler (NRC Region III)
NRC Resident Office
T. Houvenagle (UD)

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Background:

The Standby Gas Treatment System (SGTS) operates at approximately 4,000 cfm per train to meet the following design requirements:

- Maintain a minimum of 1/4 inch w.g. negative pressure in certain areas of the plant (secondary containment)
- Assure a minimum residence time for short half-life radionuclides.

The first requirement is the basis for the minimum allowable SGTS flowrate because the negative pressure increases with flowrate. The second requirement is the basis for the maximum allowable SGTS flowrate because the gas residence time for radionuclide decay decreases as flow increases. The primary safety-related design parameter for the SGTS is system flow rate (per train). The maximum flowrate was established as 4,000 cfm to maintain a 40 fpm gas velocity through the charcoal filter face area of 100 ft^2. The 40 fpm velocity is consistent with Regulatory Guide (RG) 1.52 and filter specifications utilized at the time the filter was purchased. Any flowrate for the SGTS in excess of 4,000 cfm would result in a velocity greater than 40 fpm at the filter.

The minimum flow required to assure sufficient negative pressure for the secondary containment is verified directly during each refueling by DAEC Technical Specification Surveillance 4.7.C.1.c, which requires that, with a SGTS train flowrate of not more than 4,000 cfm, the secondary containment can be maintained at 1/4 inch water vacuum under calm wind conditions. As long as this surveillance is successful it is not important what air flow rate is required (providing it is less than 4,000 cfm).

This proposed license amendment is requested due to difficulties in maintaining the maximum SGTS design flowrate of 4,000 cfm during testing. In lieu of the 4,000 cfm flowrate, the acceptance criteria will be revised to allow an acceptable flowrate range of 3,600 to 4,000 cfm. This minimum flow valve (3,600 cfm) is consistent with the GE Standard Technical Specifications' minimum requirement of design flow minus 10%.

Iowa Electric Light and Power Company, Docket No. 50-331,

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request: November 26, 1986.

Description of Amendment Request: The proposed license amendment would revise Duane Arnold Energy Center (DAEC) Technical Specification Section 3.7/4.7, which requires Standby Gas Treatment System surveillance testing at a flowrate of 4,000 cfm. The proposed changes would allow those SGTS tests that are required to be performed at the design flowrate to be performed in the flowrate range of design flow minus 10% (3,600 cfm) to design flow (4,000 cfm).

Basis for proposed no significant hazards consideration determination: The Commission has provided standards (10 CFR 50.92(c)) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

In reviewing this proposed request for Technical Specification change we have concluded that this amendment:

(1) does not involve a significant increase in the probability or consequences of an accident previously evaluated because the Standby Gas Treatment System will still perform its design functions and will be demonstrated to do so using this flowrate range. These tests will be performed using the same acceptance criteria for inplace cold DOP and halogenated hydrocarbon removal and maintaining a minimum 1/4 inch w.g. negative pressure in secondary containment currently in the DAEC Technical Specifications.

(2) does not create the possibility of a new or different kind of accident because it involves no modifications to the plant and affects only the testing of the Standby Gas Treatment System. The changes to the testing will not affect the performance or the design basis of the Standby Gas Treatment System as described in the updated FSAR.

(3) does not involve a significant reduction in a margin of safety because performing the revised Technical Specification Surveillance Requirements at an SGTS train flow near but below 4,000 cfm (e.g., between 3,600 and 4,000 cfm) is consistent with the design basis of the system. The SGTS flow control system will be tested to meet the same iodine retention requirement and maintain flow below 4,000 cfm and meet the 1/4 inch w.g. negative pressure requirement of Technical Specification Surveillance 4.7.C.1.c.

Therefore, this proposed license amendment is judged to involve no significant hazards consideration.

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Attorney for Licensee: Jack Newman, Kathleen H. Shea, Newman and Holtzinger, 1615 L Street NW, Washington, DC 20036