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 ROOT,L.D. Iowa Electric Light & Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 DENTON,H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards response to Generic Ltr 83-02 re NUREG-0737,
 Items I.A.1.1.3,I.A.1.3,II.E.4.1,II.E.4.2.5,II.E.4.2.6,
 II.E.4.2.7,II.K.3.3,II.K.3.13,II.K.3.22,II.K.3.15,II.K.3.19,
 II.K.3.27 & II.K.3.45.

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Iowa Electric Light and Power Company

April 25, 1983

NG-83-1411

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

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
NUREG-0737 Technical Specifications
Response to GL 83-02

Dear Mr. Denton:

On January 24, 1983 Iowa Electric received Generic Letter 83-02 concerning NUREG-0737 Technical Specifications. The attachment to this letter summarizes our response to the individual items listed in Enclosure 1 of GL 83-02.

We have identified the few items which still require Technical Specification changes in the attachment to this letter. Iowa Electric intends to submit applications for the appropriate license amendments by July 29, 1983.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/SS/rh*
Attachment

cc: S. Swails
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NUREG-0737 TECHNICAL SPECIFICATIONS
(RESPONSE TO GL 83-02)

(1) STA Training (I.A.1.1.3)

Technical Specifications (Tech Specs) have been changed to include this item. The Tech Spec change has been approved and issued as Amendment 64.

(2) Limit Overtime (I.A.1.3)

As we stated in our letter of October 29, 1982 (LDR-82-280, L. Root to H. Denton) we feel that limiting staff overtime is more effectively accomplished by Administrative Control Procedures (ACP's) than by incorporation into the Tech Specs.

DAEC Administrative Control Procedures ACP-1401.12 and ACP-1404.1 have been revised to incorporate the overtime limitations of the NRC Policy Statement on working hours (Generic Letter 82-12). We do not feel that incorporation into the Tech Specs will further increase protection of health and safety. Enclosure 1 of NUREG-0737 specifically states that Tech Specs to limit overtime are not required.

(3) Dedicated Hydrogen Penetrations (II.E.4.1)

The DAEC has an inerted BWR Mark I containment. We do not use external recombiners or purge/repressurization systems, therefore this item is not applicable.

(4) Containment Pressure Setpoint (II.E.4.2.5)

Iowa Electric provided justification for not changing our setpoint and received NRC approval in a SER dated August 28, 1981. Therefore, this item is not applicable.

(5) Containment Purge Valves (II.E.4.2.6)

The DAEC purge and vent valves are not required to be locked shut. We have submitted a Tech Spec change (RTS-133 transmitted by LDR 82-170 dated June 10, 1982) which limits the open time of containment vent/purge valves, provides for periodic leakage testing and periodic replacement of containment vent/purge valve resilient seals.

(6) Radiation Signal on Purge Valves (II.E.4.2.7)

This item is pending NRC review of the BWR Owners' Group exception to this requirement. Therefore, this item is not applicable at this time.

(7) Reporting SV and RV Failures and Challenges (II.K.3.3)

Sections 6.11.2.a.(1) and 6.11.2.b.(1) of the DAEC Tech Specs provide for the prompt reporting of safety and relief valve failures. Iowa Electric will change the Tech Specs to include safety and relief valve failures as routine reports.

(8) RCIC Restart and RCIC Suction (II.K.3.13, II.K.3.22)

Iowa Electric will submit an application for license amendment to provide Tech Specs for RCIC automatic restart and automatic switchover of RCIC suction.

(9) Isolation of HPCI and RCIC Modification (II.K.3.15)

The DAEC does not use time delay relays for this modification. We have installed hydraulic snubbers in the instrument lines to the delta P instruments and received NRC approval in a SER dated July 28, 1982. The DAEC Tech Specs contain system response times and surveillance requirements for HPCI and RCIC isolation. Therefore, a Tech Spec change is not required.

(10) Interlock on Recirculation Pump Loops (II.K.3.19)

Interlocks are required on non-jet pump plants. The DAEC uses jet pumps, therefore, this item is not applicable.

(11) Common Reference Level (II.K.3.27)

The DAEC Tech Specs have been changed to include this item. Amendment 86 incorporates this change.

(12) Manual Depressurization (II.K.3.45)

According to GL 83-02, the NRC staff has determined that no modifications in plant design and operation are required. Therefore, no Tech Spec changes are required.