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 FACIL:50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
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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

SUBJECT: Provides revised response to Generic Ltr 83-36, "NUREG-0737
 Tech Specs," per 840416 & 0613 requests to include listed
 aspects re control room habitability requirements.
 Justification of plan not to incorporate provisions encl.

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NOTES: 05000331
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Iowa Electric Light and Power Company

July 20, 1984
NG-84-2848

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
Response to NRC Request to Revise Generic
Letter 83-36 Submittal

Reference: Letter, R. McGaughey (IE) to H. Denton (NRC)
dated January 27, 1984 (NG-84-0001)

Dear Mr. Denton:

Background

On January 27, 1984, Iowa Electric Light and Power Company requested revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The request for TS revision was submitted in response to Generic Letter 83-36, "NUREG-0737 Technical Specifications".

Discussion

Subsequent to the above submittal, our NRC Licensing Project Manager verbally advised us on April 16, 1984, and in a meeting at our office on June 13, 1984, that pursuant to Generic Letter 83-36, we should revise our January 27 submittal to include other aspects regarding control room habitability requirements. Specifically it was Thadani requested that:

- (1) A surveillance requirement be added to the DAEC TS which states each control room emergency filtration subsystem shall be demonstrated OPERABLE at least once per 12 hours by verifying that the control room air temperature is less than or equal to 80°F; and,
- (2) A surveillance requirement be added to the DAEC TS which states, each control room emergency filtration subsystem shall be demonstrated OPERABLE at least once per 18 months by verifying that on each of the below pressurization mode

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Mr. Harold Denton
July 20, 1984
NG-84-2848
Page Two

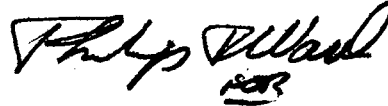
actuation test signals, the subsystem automatically switches to the pressurization mode of operation and the control room is maintained at a positive pressure of 1/8 inch water gauge relative to the outside atmosphere during subsystem operation at a flow rate less than or equal to 2,000 cfm:

- a) smoke detection
- b) air intake radiation monitors.

Based upon our review of the Staff's request and the existing plant design, we do not currently plan to incorporate the provisions set out above into the DAEC Technical Specifications. The justification for our decision is explained in detail in Enclosures 1 and 2, respectively.

If you have any questions regarding this submittal, please feel free to call me.

Very truly yours,



Richard W. McGaughy
Manager, Nuclear Division

RWM/MSG/dmb*

Enclosures (2)

cc: M. Grim
L. Liu
S. Tuthill
M. Thadani
NRC Resident Office
Commitment Control No. 83-0285

CONTROL ROOM AIR TEMPERATURE

Background

Generic Letter 83-36, "NUREG-0737 Technical Specifications" recommended licensees adopt the guidance of Surveillance Requirement 4.7.2a which states, "Each Control Room emergency filtration subsystem shall be demonstrated operable at least once per 12 hours by verifying that the control room air temperature is less than or equal to (80°F)(sic)."

Discussion

We have reviewed the Duane Arnold Energy Center (DAEC) design and concluded that adoption of the Generic Letter's guidance is inappropriate in view of the existing configuration of the Standby Filter Units (SFU) at the DAEC¹. The temperature conditioning of ventilation air entering the DAEC control room is accomplished by two air conditioning units (1V-AC-30A&B) which are separate and independent of the SFUs. Each air conditioning unit is capable of heating or cooling 100% of the required air to the control room and other control building spaces during both normal operation and during emergency operation of the Standby Filter Units.

Therefore, the maintenance of the Control Room air temperature is not a function of the Standby Filter Units and the control room air temperature cannot be used to determine whether the SFU's are indeed operable.

This surveillance requirement might possibly apply if the control room temperature conditioning unit were an integral part of the SFU. However, this is not the fact at the DAEC.

Operability of the main control room ventilation system is discussed in DAEC Technical Specification 3.10.A, 4.10.A and associated bases as revised pursuant to Generic Letter 83-36.² The applicable surveillance requirements are also discussed, in detail, in the following attachment.

Summary

Based on the above noted design configuration differences and current performance of main control room ventilation system operability tests, we do not currently plan to adopt the surveillance requirement suggested in Item 4.7.2.a of Enclosure 3 of Generic Letter 83-36.

NOTES:

¹The emergency filtration subsystem referred to in Generic Letter 83-36 is called the main control room ventilation system at the DAEC. The Standby Filter Units are components of the main control room ventilation system.

²Letter, R. McGaughy (IE) to H. Denton (NRC) dated January 27, 1984 (NG-84-0001), "Response to Generic Letter 83-36".

ACTUATION OF CONTROL ROOM
EMERGENCY FILTRATION SUBSYSTEM

Background

Generic Letter 83-36, "NUREG-0737 Technical Specifications" recommended licensees adopt the guidance of Surveillance Requirement 4.7.2.e.3 to show the control room emergency filtration subsystem is automatically actuated upon receipt of a test signal.¹

Discussion

We have reviewed the Generic Letter guidance and concluded that the Duane Arnold Energy Center (DAEC) Technical Specifications currently meet the NRC staff guidance.

Existing DAEC Technical Specification Surveillance Requirement 4.10.A.3 states, "at least once per operating cycle automatic initiation of the control room air treatment system shall be demonstrated." The Technical Specification Bases (3.10.A) shows the purpose of the main control room ventilation system, which is, "designed to filter the control room atmosphere for intake air and/or for recirculation during control room isolation conditions. The control room air treatment system is designed to automatically start upon control room isolation and to maintain the control room pressure to the design positive pressure so that all leakage should be out leakage." The Technical Specification Bases (4.10.A) further states, "demonstration of the automatic initiation capability is necessary to assure system performance capability."

Existing DAEC Surveillance Requirement 4.10.A.3 in conjunction with more restrictive Limiting Conditions for Operation (LCO) requirements² and required system testing following significant painting, and partial or total replacement of HEPA filters/charcoal adsorbers provide adequate assurance the control room air treatment system will be available when necessary to protect the health and safety of our control room personnel.

Summary

Based upon our review of the DAEC Technical Specifications, we do not currently plan to adopt the surveillance requirement suggested in item 4.7.2.e.3 of Enclosure 3 of Generic Letter 83-36 for the control room emergency filtration subsystems (main control room ventilation) as we believe existing DAEC Surveillance Requirement 4.10.A.3 satisfactorily demonstrates operability of the systems.

NOTES:

¹The emergency filtration subsystem referred to in Generic Letter 83-36 is called the main control room ventilation system at the DAEC.

²Letter, R. McGaughy (IE) to H. Denton (NRC) dated January 27, 1984 (NG-84-0001), "Response to Generic Letter 83-36".