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 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards revised no significant hazards analysis which
 supersedes analysis attached to 841109 license amend
 request. Rev reflects proposed use of hourly fire patrol
 should fire barrier penetration seals become nonfunctional.

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Iowa Electric Light and Power Company
January 18, 1985
NG-85-0172

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
Revision of 10 CFR 50.92 Analysis
File: P-72a

Dear Mr. Denton:

In response to a December 28, 1984, telephone conversation between our NRC Project Manager and Mr. Mike Grim of my staff, we are transmitting a revised "no significant hazards" analysis which supersedes the analysis attached to our license amendment request, RTS-173, dated November 9, 1984 (NG-84-3987).

The revised analysis was requested to reflect the proposed use of an hourly fire patrol, in conjunction with operable fire detection instrumentation, in lieu of a continuous fire watch, should fire barrier penetration seals protecting safety-related areas become non-functional. The license amendment request is similar to a request dated March 16, 1984, by Philadelphia Electric Company (PECO) for their Peach Bottom Atomic Power Station, Units 2 and 3 (NRC Docket Nos. 50-277 and 50-278). The PECO request was granted by the NRC in their Safety Evaluation Report dated June 20, 1984 (see also 49 FR 17870 and 49 FR 29930).

Should you have any questions, please feel free to call me.

Very truly yours,



Richard W. McGaughey
Manager, Nuclear Division

RWM/MSG/ta*

Attachment: Revised 10 CFR 50.92 Analysis

cc: M. Grim
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EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Summary

The purpose of this proposed Technical Specification (TS) change request, RTS-173, is to incorporate appropriate surveillance requirements for fire doors, raceway wrap, and structural steel fireproofing into the Duane Arnold Energy Center (DAEC) Technical Specifications. Iowa Electric is also proposing the use of an hourly fire watch patrol, in conjunction with operable fire detectors, in lieu of a continuous fire watch, should fire barrier penetration seals become non-functional. This change would permit the licensee to utilize the same guidance contained in the BWR Standard Technical Specifications (STS) (NUREG-0123, Revision 3). It is noted that this proposed TS change request exceeds the requirements of 10 CFR Part 50, Appendix R. In addition, a typographical error found on page 3.13-7, is corrected by this TS change request.

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: The addition of new surveillance requirements for fire doors, raceway wrap, and structural steel fireproofing will not increase the probability or consequences of an accident. The proposed surveillance requirements will be effective in assuring that, in case of fire, the fire doors, raceway cables and structural steel will perform their intended design function which is to maintain the integrity of the associated fire barrier and prevent fire propagation outside of the affected fire zone.

Revising the Limiting Condition for Operation (LCO) of TS Section 3.13.F to provide an hourly fire patrol whenever fire barrier penetration seals are inoperable, in lieu of a continuous fire watch, does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed hourly fire watch patrol, used in conjunction with operable fire detectors on one side of the fire barrier, ensures that, should a fire occur, the fire will be readily detected. The proposed license amendment allows the licensee, Iowa Electric, to take proper credit for compliance to 10 CFR Part 50, Appendix R requirements. It is noted that should fire detectors be inoperable, a continuous fire watch must be used.

Correcting a typographical error from "wtihin" (sic) to "within" does not increase the probability or consequences of an accident previously evaluated.

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

Response: The addition of the proposed surveillance and associated limiting condition for operation (LCO) requirements will not create a new or different kind of accident from those evaluated in Chapter 15 of the DAEC Updated Final Safety Analysis Report. By inspecting fire doors, raceway wrap and structural steel fireproofing, it is expected that, should a fire occur, these fire protection features will decrease the probability of fire propagation outside of the affected fire zone. Containing a postulated fire will decrease the possibility of spurious operation of safety-related equipment due to electrical short circuits.

The proposed use of an hourly fire watch patrol, in lieu of a continuous fire watch, does not create the possibility of a new or different kind of accident than previously evaluated. The license amendment request allows the licensee, Iowa Electric, to use an hourly fire watch patrol, in conjunction with operable fire detectors on one side of the fire barrier, in lieu of a continuous fire watch. The proposed license amendment request allows Iowa Electric to take proper credit for compliance to the requirements of 10 CFR Part 50, Appendix R. It is noted that Iowa Electric is proposing an LCO similar to that allowed in the General Electric Standard Technical Specifications (STS) for BWR/4 plants (see STS Section 3.7.8).

Correcting a typographical error from "wtihin" (sic) to "within" does not create a new or different kind of accident than previously evaluated.

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

Response: No. The proposed surveillance and associated LCO requirements increase the margin of plant safety by assuring the integrity of fire doors, raceway wrap and structural steel fireproofing. Periodic inspection of the fire protection features will assure that a postulated fire will be contained within the affected fire zone.

Using an hourly fire watch patrol, in conjunction with operable fire detectors on one side of the fire barrier, does not involve a significant reduction in the plant margin of safety. The proposed license amendment request would provide an equivalent margin of safety by allowing the licensee, Iowa Electric, to take credit for modifications implemented pursuant to 10 CFR Part 50, Appendix R. The use of the fire detection system, augmented by an hourly fire watch patrol, provides an equivalent and reliable alternative option to the continuous fire watch requirements currently specified in the DAEC Technical Specifications.

Correcting a typographical error from "wtihin" (sic) to "within" does not reduce the margin of plant safety.

In the April 6, 1983 Federal Register, the NRC published examples of amendments that are not likely to involve a significant hazards concern. Example number two of that list states:

"A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications; for example, a more stringent surveillance requirement."

Iowa Electric believes this proposed license amendment does not involve a significant hazards concern as it clearly fits within the scope of the above example.

The use of an hourly fire watch patrol, in conjunction with the use of operable fire detectors, in lieu of a continuous fire watch, is not specifically addressed in the "no significant hazards" examples published in the April 6, 1983 Federal Register. However, example number six of the referenced Federal Register citation best fits the proposed change. Example number six states:

"A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan..."

Iowa Electric believes the proposed change does not involve a significant hazards concern, as the change follows the guidance contained in the General Electric STS and Section III.G.2.e. of 10 CFR Part 50, Appendix R (the fire protection rule). Additionally, it is believed that the use of an hourly fire watch patrol, in conjunction with operable fire detectors, provides a level of protection equivalent to that currently found in the DAEC Technical Specifications.

The correction of a typographical error does not involve a significant hazards concern as example number one of the April 6, 1983 Federal Register states: "a purely administrative change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature" is an example of an amendment not likely to involve a significant hazards consideration.