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FROM: Iowa Elec. Light & Power Cedar Rapids, Iowa Charles W. Sandford			DATE OF DOC 5-5-75	DATE REC'D 5-12-75	LTR XX	TWX	RPT	OTHER
TO: Mr. B.C. LRusche			ORIG 3 signed	CC 37	OTHER	SENT AEC PDR XX SENT LOCAL PDR XX		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 40		DOCKET NO: 50-331		

DESCRIPTION: Ltr notarized 5-5-75 requesting for an amdt of DPR-49 to incorporate proposed changes in Tech Specs(App B to Lic.) for Duane Arnold Center & trans the following:

ENCLOSURES: Proposed Change to Tech Specs(App. B to Lic.)....

(40 cys encl rec'd)

ACKNOWLEDGED

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PLANT NAME: ~~XXXXXXXX~~ Duane Arnold Center

FOR ACTION/INFORMATION

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50-331

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

CHARLES W. SANDFORD
EXECUTIVE VICE PRESIDENT

May 5, 1975

Regulatory Docket File



Mr. B. C. Rusche, Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20545

Dear Mr. Rusche:

Transmitted herewith, in accordance with the requirements of 10 CFR 50.59 and 50.90, is an application for amendment of DPR-49 to incorporate proposed changes in technical specifications (Appendix B to License) for the Duane Arnold Energy Center (DAEC), described in the enclosures hereto.

These proposed changes have been reviewed and approved by the DAEC Operations Committee and the DAEC Safety Committee and do not involve a significant hazards consideration.

Three signed and notarized originals and thirty-seven additional copies of this application are transmitted herewith. This application, consisting of the foregoing letter and enclosures hereto, is true and accurate to the best of my knowledge and belief.

Iowa Electric Light and Power Company

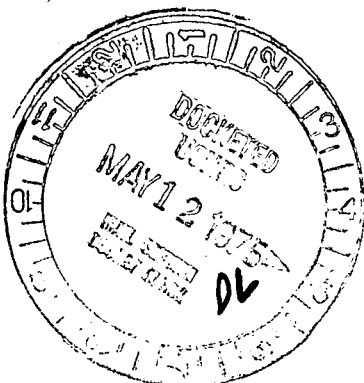
Charles W. Sandford
Charles W. Sandford
Executive Vice President

CWS:D
cc: w/enclosures
D. Arnold
O. Lynch
J. Keppler
J. Newman

Sworn and subscribed to me this
5th day of May, 1975.

Marjorie E. McDonald
Notary Public in and for the State
of Iowa.

Marjorie E. McDonald
NOTARY PUBLIC
State of Iowa
Commission Expires
September 30, 1976



5215

PROPOSED CHANGE ETS-8 TO TECHNICAL SPECIFICATIONS

Regulatory Docket File

I. Affected Technical Specification

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

"4.1.1.4 Bacteriological Studies

A.

B.

C. Analyses to be made:

1. Total plate count (20C.)

2.

3.

4.

5-5-75

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

In Specification 4.1.1.4.C.1 change "20C" to "37°C".

III. Justification for Proposed Change

Bacteria growth at 20°C has proven inconsistent. Total bacteria population at 37°C has proven more definitive and produced more consistent results. At the present time the studies are done at both 20°C and 37°C in order to comply with Technical Specifications. Performing the study at both temperatures is unnecessary, therefore this proposed change is requested.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

PROPOSED CHANGE ETS-9 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specifications

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

"4.1.1.5 Benthic (bottom organism) Studies

A. Frequency: Quarterly

B.

C.

"

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

Change the frequency from "Quarterly" to "Three times per year during Spring, Summer and Fall, as available."

III. Justification for Proposed Change

The winter months are not conducive to bottom organism growth so generally none are available then for study. This change is therefore proposed to make this study consistent with the frequency specified for similar studies in Specification 4.1.1 dealing with aquatic organisms.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

PROPOSED CHANGE ETS-10 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specifications

The technical specifications for the DAEC (DPR-49, Appendix B) provide for a preoperational and an operational environmental radioactivity monitoring program as specified in Table 4.3-1.

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

Change Table 4.3-1 as per the marked-up attached copy.

III. Justification for Proposed Change

The purpose of this proposed change is to make the DAEC Radiological Environmental Monitoring Program consistent with the Nuclear Regulatory Commission proposed Model Technical Specification for Radiological Environmental Monitoring Program and to delete the portion of the monitoring program pertaining to the Preoperational Program since the plant is now operational and there is no further need for preoperational data acquisition.

The following analyses, which were apart of the Preoperational Program, but which might have been considered to be a part of the Operational Program were deleted for the reasons given below:

- A. Radium - 226 is a naturally occurring nuclide and was included in the Preoperational Program to gain baseline data. Since it is not produced in the reactor there is no reason for monitoring it in the Operational Program.
- B. The gross alpha measurement was deleted since ingestion or inhalation of alpha emitters does not represent a significant exposure pathway at an operating nuclear power plant. Now that the plant has been operating for a period of time any alpha emitters that may be released will be accomplished by a much higher level of beta-gamma emitters which are monitored.
- C. The gross beta measurement was deleted since the evaluation of various exposure pathways requires information on individual radionuclides that are present but are not possible to measure using the gross beta method. This specific information is obtained by gamma spectrometry and radiochemistry. The gross beta measurements are used only for screening purposes and are then useful only for air particulate filters and water.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

TABLE 4.3-1

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Airborne Particulates	1	Cedar Rapids	Weekly	Weekly Analysis	Gross alpha	Analyzed for Gross
	2	Marion	Analysis		Gross beta	beta after a
	3	Hiawatha				minimum of 24 hr.
	4	Morris				decay.
	5	Palo	Continuous	Continuous		Gamma spectrum
	6	Center Point	Collection	Collection		analysis will be
	7	Shellsburg				performed on each
	8	Urbana				sample showing
	9	Route W26				measurable gross
	10	Atkins				beta activity ₃
	11	Toddville				i.e. 10 pCi/m ³
	12	Iowa City				Routine gross alpha
	13	Alburnett				analysis during
	14	Alice				preoperational
	15	On-site				phase.
	16	On-site	Weekly	Quarterly	Gamma isotopic	During operational
			Composite	Composite	analysis	phase, A gamma
						isotopic analysis
						will be performed
						quarterly on a
						composite of each
						sample station.
						During preoperation-
						al phase all air
						samples will be
						composited on a
						weekly basis and
						gamma spectrum
						analyzed.

4.3-3

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Air Iodine	4	Morris	Preoperational Program	Weekly Analysis Continuous Collection	Radioiodine	Analyzed weekly as two composite samples unless absence of radioiodine can be demonstrated. If radioiodine is detected, each charcoal cartridge will be analyzed individually.
	5	Palo				
	7	Shellsburg				
	8	Urbana				
	11	Toddville				
	12	Iowa City				
	14	Alice				
	15	On-site				
Ambient Radiation	1-16	Same as Airborne Particulates	Monthly and Annual Analysis	Monthly and Annual Analysis	Radiation Dose	Each dosimeter will consist of 5 hot pressed LiF chips.
			Continuous Collection	Continuous Collection		Two badges at each location one changed monthly and one changed annually.

4.3-4

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Ambient Radiation	17-32	At centerline of each 22-1/2° sector intersecting the site boundary	Monthly and Annual Analysis	Monthly and Annual Analysis	Radiation Dose	Two badges at each location, one changed monthly and one changed annually
Ambient Radiation	33-48	At centerline of each 22-1/2° sector at a distance of 1 to 3 miles from the plant stack	Monthly and Annual Analysis	Monthly and Annual Analysis	Radiation Dose	Two badges at each location, one changed monthly and one changed annually.
Surface Water	49	Lewis Access	Monthly	Monthly	Gross alpha	Routine gross alpha
	50	Plant Intake			Gross beta	during preoperation
	51	Plant Discharge*			Gamma isotopic	al phase.
	52	Cedar Rapids City Park			Analysis	Gamma isotopic analysis will be performed on each sample in which the gross beta activity exceeds 10 pCi/l
	73	Hansen Farm Pond				
	75	Krewson Farm Pond				
				<i>*In addition to the routine monthly sample is also sampling to be performed during liquid radioactive waste discharge operation</i>	Tritium	Monthly samples will be composited quarterly for tritium analysis

4.3-5

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Surface Water (Cont'd.)	49-52				⁸⁹ Sr, ⁹⁰ Sr	Performed if gross beta activity exceeds 10 pCi/l and on a quarterly basis.
					²²⁶Ra	Routine ²²⁶Ra during preoperational phase.
Ground Water	53	Treated Municipal Water	Monthly	Monthly	Gross alpha	Routine gross alpha during preoperational phase.
	54	Inlet to Municipal Water Treatment Sys.			Gross beta	
	57-60	4 off-site wells (in vicinity of site)			Gamma isotopic analysis	Gamma isotopic analysis will be performed on each sample in which the gross beta activity exceeds 10 pCi/l. Daily grab sample of untreated municipal water is composited for monthly analysis. Two hour grab sample of treated municipal water is composited for monthly analysis.

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Ground Water (Cont'd.)					Tritium	Monthly samples will be composited quarterly for tritium.
					^{89}Sr , ^{90}Sr	Performed if gross beta activity exceeds 10 pCi/l and on a quarterly basis. 4.3-7
					^{226}Ra	Routine ^{226}Ra during preoperational phase.

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Bottom Sediments	49	Lewis Access	Monthly	Semi-Annually	Gross alpha	Routine gross alpha
	50	Plant intake			Gross beta -K⁴⁰	and gross beta -K⁴⁰
	51	Plant Discharge			Gamma isotopic analysis 90Sr	during preoperational phase.
	61	One-half mile below plant discharge				
Soil	15	On-site	Quarterly	Annual during growing season	Gross alpha	Routine gross alpha
	16	On-site			Gross beta -K⁴⁰	and gross beta -K⁴⁰
	62-73	Farms (within 10 miles of the site) that raise food crops			Gamma isotopic analysis 90Sr	during preoperational phase.
	74	Irrigated farm downstream of plant				Surface sample from undisturbed area.
Vegetation	62-73	Farms that raise food crops	Annually at harvest time	Annually at harvest time	Gross alpha Gross beta -K⁴⁰ Gamma isotopic analysis 90Sr	Routine gross alpha and gross beta -K⁴⁰ during preoperational phase. Only the edible portion of crops will be analyzed.
Meat and Poultry		Farms (within 10 miles of the site) that raise poultry or animals for human consumption	As Available	Annually during or immediately following grazing season	Gamma isotopic analysis on edible portions	The specific location of these samples will vary with availability

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Aquatic Biota (Periphyton)	Cedar River		Quarterly (as available)	Quarterly (as available)	Gross alpha Gross beta K^{40} Gamma isotopic analysis	Routine gross alpha and gross beta K^{40} during preoperation al phase
Wildlife	Palo Marsh (or other areas as required to obtain representative samples)		Semi-Annually	Semi-Annually	Gross alpha Gross beta K^{40} I-131 in thyroid Cs-137 in muscle Sr-90 in bone Gamma isotopic analysis	Preoperational phase Operational phase
Fish	Cedar River		Quarterly	Semi-Annually	Gross alpha Gross beta K^{40} Gamma isotopic analysis Sr-90 in bone Gamma isotopic analysis	Preoperational phase Operational phase

TABLE 4.3-1 (Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Milk	62	Control Farm near Brendon, Iowa	Monthly	Weekly	^{131}I	Preoperationally ^{131}I will be analyzed routinely on a monthly basis and more frequently if ^{131}I is detected or suspected. Operationally During the grazing season samples from locations 63, 94 and 93 will be analyzed individually. Operationally During the grazing season samples from locations 64, 66, 67, 68, 71 & 72 will be composited and analyzed. If the composite sample is greater than 2.4 pCi/l the location will be resampled and samples analyzed individually. Operationally During the grazing season samples from locations 62 and 73 will be composited and analyzed. If the composite sample is greater than 2.4 pCi/l the location will be resampled and samples analyzed individually.
	63-64	Dairy farms within 10 mi. of site				
	66-68	Dairy farms within 10 mi. of site				
	71-72	Dairy farms within 10 mi. of site				
	73	Control farm near Amana, Iowa				
	94	Dairy farm within 10 mi. of site				
	93	Dairy farm within 10 mi. of site				

TABLE 4.3-1(Continued)

ENVIRONMENTAL RADIOACTIVITY MONITORING PROGRAM FOR THE DUANE ARNOLD ENERGY CENTER

SAMPLING DESCRIPTION			SAMPLE FREQUENCY		ANALYSIS	REMARKS
Type of Sample	Sample Point	Sampling Point Description	Preoperational Program	Operational Program		
Milk	62	Control farm near Brendon, Iowa	Monthly	Monthly	⁸⁹ Sr	Operationally During the grazing season a
	63-64	Dairy farms within 10 mi. of site			⁹⁰ Sr	portion of the weekly
	66-68	Dairy farms within 10 mi. of site			¹³⁷ Cs	sample from each loca-
	71-72	Dairy farms within 10 mi. of site			¹⁴⁰ Ba - ¹⁴⁰ La	tion will be composi-
					Elemental Ca	ted for analysis.
	73	Control farm near Amana, Iowa		Monthly	¹³¹ I	Operationally During the non-grazing season
	94	Dairy farm within 10 mi. of site				a sample from all lo-
	93	Dairy farm within 10 mi. of site				tions except locations 62 and 73 will be composited and analyzed.
						Operationally During the non-grazing season a sample from loca-
						tions 62 & 73 will be composited and analyzed.

4.3-11

PROPOSED CHANGE ETS-11 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specifications

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

Specification 3.3.1.C.1

"The gaseous, particulate and iodine activity released from the reactor building ventilation stacks and the off gas stack shall be monitored and recorded. The particulate filters and iodine cartridges monitoring the activity released from the turbine building exhaust fans shall be collected and analyzed in accordance with Table 3.3-2."

Specification 2.3.1.C.6 provides the same as 3.3.1.C.1.

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

The portions of Specifications 3.3.1.C.1 and 2.3.1.C.6 shown above are to be rewritten as follows:

"The gaseous activity released from the reactor building ventilation stacks and the off gas stack shall be monitored and recorded continuously. The particulate filters and iodine cartridges monitoring the activity released from the reactor building ventilation stacks, the off gas stack and the turbine building exhaust fans shall be collected and analyzed in accordance with Table 3.3-2."

Parts "a" and "b" of the above Specifications remain the same.

III. Justification for Proposed Change

Iowa Electric Light and Power Company's intent when developing these technical specifications was that gaseous activity would be monitored and recorded continuously. Particulate and iodine would be monitored continuously by means of the filters and cartridges but would be recorded when the filters and cartridges are periodically removed and analyzed as specified in Table 3.3-2. It is not possible with the DAEC installation to record continuously the activity shown by the particulate filters and iodine cartridges on the reactor building ventilation stacks and the off gas stack, and this was not the original intent. The above change is proposed to clarify the intent of the specification.

IV. Review Procedure

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

PROPOSED CHANGE ETS- 12 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specifications

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

Specification 2.2.1.C

"If total residual chlorine is not maintained below 0.1 mg/l at all times, the special studies described in Section 4.1.1.10 shall be conducted."

Specification 4.1.1.12

"A study will be conducted to determine optimum methods of chlorination on a seasonally adjusted, regular, intermittent basis so as to result in the optimum balance between effective control of condenser biological slime and scale formation and the detrimental effects of chloramines on aquatic life.

As a part of this study, the following will be accomplished.

A. During the first year:

1. Determine free and total residual in circulating water system blowdown during chlorination period, 2 times/month.
2. Determine free and total residual in river during and following chlorination (to catch peak) for same period as in A.1 above, 2 times/month.

B. During a 90 day period to include Spring conditions when chlorine demand may be most troublesome:

1. Determine free and total residual at condenser exit once/day at the end of a chlorination period.
2. Determine free and total residual in tower blowdown once/day at end of same chlorination period used in B.1 above."

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

Change Specification 2.2.1.C to read as follows:

"If total residual chlorine is not maintained below 0.1 mg/l at all times, the special studies described in Sections 4.1.1.10 and 4.1.1.12 shall be conducted."

Change Specifications 4.1.1.12.A.1, 4.1.1.12.A.2, 4.1.1.12.B.1 and 4.1.1.12.B.2 to read as follows:

- A. During the first year:
 - 1. Determine free and total residual chlorine in circulating water system blow down during chlorination period if chlorination takes place during such blowdown.
 - 2. Determine free and total residual chlorine in river during and following chlorination (to catch peak) if chlorination takes place during tower de-icing at the intake structure.
- B. During a 90 day period if discharging chlorine to include Spring conditions when chlorine demand may be most troublesome:
 - 1. Determine free and total residual chlorine at condenser exit at the end of the chlorination period.
 - 2. Determine free and total residual chlorine in tower blowdown at end of same chlorination period used in B.1 above if chlorination takes place during tower blowdown.

III. Justification for Proposed Change

The purpose of this proposed change is to clarify when the chlorine study has to be performed. The only way that chlorine can get to the river is during the time when tower blowdown or tower de-icing is being performed, consequently the only time that the study will have any meaning is if it is performed when chlorination takes place during blowdown or de-icing. Accordingly, the change would require chlorine studies only when chlorination is performed during tower blowdown or tower de-icing.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

PROPOSED CHANGE ETS-13 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specification

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

"4.1.1.7 Fisheries Studies

(Second Sentence) Seining, boiled hoop nets and"

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

Change "boiled hoop nets" to "baited hoop nets".

III. Justification for Proposed Change

Typing error in original submittal of technical specifications.

IV. Review Procedure

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

PROPOSED CHANGE ETS-14 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specification

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

"4.1.2 Terrestrial

Specification (Second paragraph)

A monthly visual inspection will be made of the vegetation on and around the site in the direction of prevailing winds to determine any possible salt drift damage....."

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

Change the subject sentence to read as follows:

"A monthly visual inspection during the growing season (May through September) will be made of the vegetation on and around the site in the direction of prevailing winds to determine any possible salt drift damage....."

III. Justification for Proposed Change

Phytotoxicity (affect of poison to plants) is always detected by the examination of either the leaves or fruiting bodies of plants and for this reason sampling and testing would be relevant only during the growing season which is May through September. For this reason the above change is proposed.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

PROPOSED CHANGE ETS-15 TO TECHNICAL SPECIFICATIONS

I. Affected Technical Specification

The technical specifications for the DAEC (DPR-49, Appendix B) provide as follows:

Specification 5.2.A, p.5.2-1

"Any Environmental Technical Specification (ETS) violation will be reported immediately to the Chief Engineer and the General Production Manager and promptly reviewed as specified in Section 5.1."

Specification 5.2.C, p. 5.2-1

"Copies of all such reports will be submitted to the General Production Manager and Safety Committee for review and approval of any recommendations."

II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following changes in the technical specifications set forth in I, above:

Change "General Production Manager" to "Vice President-Generation."

III. Justification for Proposed Change

The new corporate position of Vice President-Generation was established by the Iowa Electric Light and Power Company Board of Directors on February 4, 1975. The Vice President-Generation is responsible for all the activities previously assigned to the Production Department pertaining to the operation, maintenance and facility expansion activities of the electric generating properties. For this reason these changes are proposed.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.