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U.S. NUCLEAR REGULATORY COMMISSION

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TO: Mr. George Lear	FROM: Iowa Elec. Light & Power Co. Cedar Rapids, Iowa Lee Liu
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DESCRIPTION: Ltr furn info on Enviro Tech Specs (App. B) for the Duan Arnold Plant...

ENCLOSURE

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ACKNOWLEDGED

PLANT NAME: Duane Arnold Plant

FOR ACTION/INFORMATION ENVIRO DHL 8-5-76

SAFETY		ENVIRO	
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[X] BRANCH CHIEF: (6)	LEAR	[X] BRANCH CHIEF:	REGAN
[X] PROJECT MANAGER:	Shea	[X] PROJECT MANAGER:	BEVAN
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EXTERNAL DISTRIBUTION

[X] LPDR: Cedar Rapids, Iowa	NAT LAB:	BROOKHAVEN NAT LAB	CONTROL NUMBER
[X] TIC:	REG. VIE	ULRIKSON(ORNL)	
[X] NSIC:	LA PDR		7846
[ ] ASLB:	CONSULTANTS		
[X] ACRS 16 CYS [redacted] SENT TO L.A.			

Regulatory Docket File

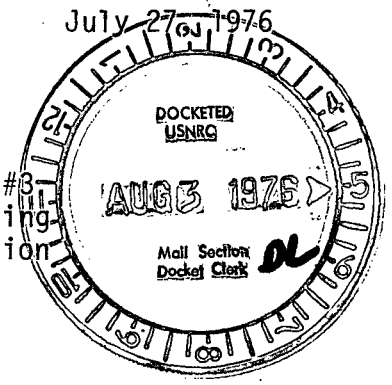
50-331

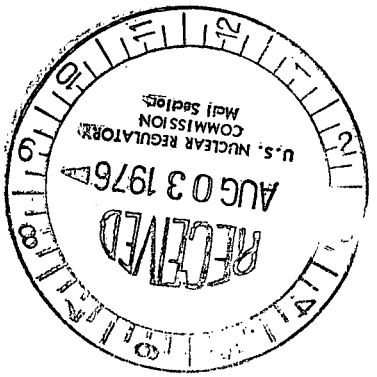
IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

July 27, 1976





Mr. George Lear
Operating Reactors Branch #3
Division of Reactor Licensing
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Lear:

The purpose of this letter is to present our interpretation of various items in the Environmental Technical Specifications (Appendix B to License DPR-49) for the Duane Arnold Energy Center. During plant inspections by the Region III Office of Inspection and Enforcement there have been differences of agreement in interpretation of the Technical Specifications and Region III has asked that we present our interpretation to you to see if it meets the intent of the Technical Specifications.

The items under discussion with the Region III Office of Inspection and Enforcement are as follows:

1. Specifications 2.1, 2.2 and 2.3 - The Environmental Technical Specifications (ETS) do not specify a tolerance for the surveillance frequencies specified in Appendix B.

   It is proposed to use the same tolerance as specified in Appendix A as follows:

   > "Surveillance Frequency - Periodic surveillance tests, checks, calibrations and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted plus or minus 25%. The operating cycle interval as pertaining to instrument and electrical surveillance shall never exceed 15 months. In cases where the elapsed interval has exceeded 100% of the specified interval, the next surveillance interval shall commence at the end of the original specified interval."

2. Specification 3.3.1.B.2 states as follows:

   > "Prior to release of each batch of liquid effluent, a sample shall be taken from the batch and analyzed for gross radioactivity (β,γ) and the concentration of each significant gamma energy peak to demonstrate compliance with 2.3.1.B using the circulating water flow rate at the time of discharge."

   We interpret "circulation water" to mean the dilution water flow which includes blowdown and radwaste dilution flow. The circulating water itself is not used as dilution flow.

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3. Specification 2.3.1.C.1 contains a definition as follows:

   "MPC_i = maximum permissible concentration for isotope i as defined in 10 CFR Part 20, Appendix B, Table II, Column 1."

   We interpret this as foblows:

   "
   $$MPC_i = \frac{\text{Total Concentration}}{\frac{C_A}{MPC_A} + \frac{C_B}{MPC_B} + \cdots}$$

   where MPC_A, MPC_B, etc., are maximum permissible concentrations for isotopes A, B, etc., as defined in 10 CFR Part 20, Appendix B, Table II, Column 1."

   This interpretation is necessary in order to determine MPI_i when more than one isotope is present.

4. Specification 2.3.1.C.2 contains a formula for combined maximum stack release rate and ventilation release rate. The signs "$\leq$" should be added so that the formula reads as follows:

   "$$\frac{Qs}{1.3 \times 10^{-6}} + \frac{Qv}{1.8 \times 10^{-7}} \leq 1.0"$$

5. Specification 2.3.1.C.4 states as follows:

   "If the limits of 2.3.1.C.1, 2.3.1.C.2 or 2.3.1.C.3 are exceeded, appropriate corrective action such as an orderly reduction of power shall be initiated to bring the releases within the limit."

   We interpret this to be as follows:

   "If the limits of 2.3.1.C.1, 2.3.1.C.2 or 2.3.1.C.3a are exceeded, appropriate corrective action such as an orderly reduction of power shall be initiated to bring the releases within the limit."

   Specification 2.3.1.C.3.b gives reporting requirements to be initiated if certain percentages of the limits required by Specifications 2.3.1.C.1 and 2.3.1.C.2 are exceeded and are not limits on the DAEC which, if they are exceeded, require a reduction of power.

6. Specification 3.3.1.C.3.d states as follows:

   "If the gaseous waste monitors indicate an increase of greater than 50% in the steady state fission gas release after factoring out increases due to power changes."

We interpret this to be as follows:

"If the post-treatment gaseous waste monitors indicate an increase of greater than 50% in the steady state fission gas release after factoring out increases due to power changes."

Specification 3.3.1.C.3.d is one of the conditions which indicate that an isotopic analysis shall be made of a representative sample of gaseous activity, excluding tritium, at the discharge of the Steam Jet Air Ejector. As the post treatment monitor has the capability to shift the "treat" mode and/or isolate the offgas system, it is appropriate that this monitor has operability requirements. A specification requiring increased surveillance should be based on monitors with operability requirements.

7. Specification 3.3.1.C.5 states as follows:

"All effluent gas monitors shall be calibrated at least quarterly by means of a built-in check source and annually with a known radioactive source. Each monitor shall have an instrument channel test at least monthly and sensor check at least daily."

We interpret this to mean as follows:

"All effluent gas monitors (the final monitor in each release path and/or those monitors with operability requirements) shall be calibrated at least quarterly by means of a built-in check source and annually with a known radioactive source. Each monitor (the final monitor in each release path) shall have an instrument channel test at least monthly and sensor check at least daily."

8. Specification 2.3.1.C.8 states, in part, as follows:

"One reactor building exhaust vent and one plant stack monitoring system shall be operable, and the off-gas radiation monitors shall be operable or operating whenever steam pressure is available to the air ejectors....."

We interpret this to be as follows:

"One reactor building exhaust vent monitor, one plant stack monitor and both post-treatment monitors shall be operable or operating as defined in Appendix A, Specifications 3.2.D.1.a and b whenever steam pressure is available to the air ejectors....."

This interpretation is necessary to clarify what comprises a monitoring system.

These interpretations have been reviewed by the DAEC Operations Committee and Safety Committee which have found that these interpretations do not involve a significant hazards consideration. These items are not being submitted as proposed Technical Specification changes at this time since Iowa Electric contemplates revising Appendix B to License DPR-49 after issuance of final staff guidance for Technical Specifications in accordance with Appendix I to 10 CFR Part 50.

Iowa Electric Light and Power Company

By _____
Lee Liu
Vice President-Engineering

LL/OCS/D
cc: D. Arnold
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