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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331  
 AUTH. NAME AUTHOR AFFILIATION  
 MCGAUGHY, R.W. Iowa Electric Light & Power Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-49, allowing 18-month  
 implementation period for radiological effluent Tech Specs  
 & deleting App B of Tech Specs.

SEE PROPOSED CHANGE RAD. EFFL. ENVIRON. TECH SPECS

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 TITLE: OR/Licensing Submittal: Appendix I

## NOTES:

OL: 02/22/74

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	NRR/DSI/AEB		1	0	NRR/DSI/METB	08	1 1
	NRR/DSI/RAB	10	1	1	REG FILE	04	1 1
	RGN3		1	1	RGN2/DRSS/EPRPB		1 1
EXTERNAL:	ACRS	11	6	6	LPDR	03	1 1
	NRC PDR	02	1	1	NSIC	05	1 1
	NTIS		1	1			

**Iowa Electric Light and Power Company**

July 25, 1984

NG-84-2977

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  
RTS-115E, Radiological Effluent Technical  
Specifications

Dear Mr. Denton:

Transmitted herewith is a revision to our application for amendment to Appendix A and Appendix B (Technical Specifications) to Operating License DPR-49 for the Duane Arnold Energy Center (DAEC). The application (RTS-115) was submitted by letter of August 29, 1979, and revised by our submittals of June 15, 1982, LDR-82-176; April 26, 1983, NG-83-1147; July 29, 1983, NG-83-2631; and October 17, 1983, NG-83-2586.

As stated in our previous applications, due to the complexity of the Radiological Effluent Technical Specifications, an implementation period of approximately 18 months will be required. Also, as stated in our previous application, Appendix B to the Technical Specifications will be deleted in its entirety. This application, consisting of RTS-115E, incorporates the dates on which the new or revised Technical Specifications become effective, and the dates on which the Appendix B Technical Specifications are deleted. This change has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee.

A Class III amendment fee of \$4,000 was submitted with the original application. No additional fee is being submitted at this time. Additional fees, if required, will be submitted under the provisions of 10 CFR 170.

Pursuant to the requirements of 10 CFR 50.91, a copy of this application and analysis of no significant hazards considerations is being sent to our appointed state official.

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Mr. Harold Denton  
July 25, 1984  
NG-84-2977  
Page Two

Three signed and 37 additional copies of this revision are transmitted. This application, consisting of the foregoing letter and enclosures, is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY

Richard W. McGaughy  
Richard W. McGaughy  
Manager, Nuclear Division

Subscribed and sworn to Before Me on  
this 25<sup>th</sup> day of July 1984.

Kathleen M. Furman  
Notary Public in and for the State of Iowa

RWM/BWR/dmb\*

Attachments: 1) Evaluation of Change With Respect to 10 CFR 50.92  
2) Description of Proposed Change RTS-115E  
3) List of Affected Pages  
4) RTS-115E Revised Pages

cc: L. Liu  
S. Tuthill  
M. Thadani  
T. Houvenagle (ICC)  
NRC Resident Office

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

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: No. This change is administrative in nature. It is being submitted to incorporate the effective dates of the new and revised Technical Specifications into the Technical Specifications. The 18 month implementation period and deletion of the Appendix B Technical Specifications has been requested in previous applications. The original Radiological Effluent Technical Specification amendment request was to incorporate requirements into the Technical Specifications to meet the requirements of 10 CFR 50, Appendix I.

Since this change is administrative in nature, there is no increase in 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: No. As stated above, this change is administrative in nature and, therefore, does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No. This change is administrative in nature and incorporates the effective dates for the new and revised Technical Specifications and effective dates for deletion of the Appendix B Technical Specifications. There is no significant reduction in the margin of 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 numbers one and two of this list state:

"A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or change in nomenclature."

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

The revisions included in this application are judged to fall into the first example above. The previous applications of this proposed change were judged to fall into the categories covered by these two examples. The enclosed application is, therefore, judged to involve no significant hazards.

PROPOSED CHANGE RTS-115E  
TO  
DUANE ARNOLD ENERGY CENTER  
TECHNICAL SPECIFICATIONS

The holders of License DPR-49 for the Duane Arnold Energy Center propose to amend Appendix A and Appendix B (Technical Specifications) to said license by deleting current pages and replacing them with the attached new pages.

In the previous revisions of this application, Iowa Electric Light and Power Company requested a period of 18 months to implement the proposed Technical Specifications following approval by the NRC. Also, due primarily to the fact that the new and revised Specifications for Appendix A supersede the Appendix B Technical Specifications, it was requested that Appendix B be deleted in its entirety.

This revision to the application for amendment is submitted to incorporate the effective dates into the sections of the new and revised Technical Specifications in order to reflect the 18 month implementation schedule. Also, included in this application is a copy of the Appendix B Technical Specifications which reflects the dates on which the Appendix B sections will be deleted.

Specifically excluded from this submittal is Appendix B, Section 4.1 - Biological, Subsection 4.1.2 - Terrestrial. This section is the subject of another amendment request (ETS-30) currently pending.

This application has also been updated to reflect changes to the Technical Specifications due to amendments issued since the previous application.

LIST OF AFFECTED PAGES

APPENDIX A

1.0-6 through 1.0-9  
3.2-2 through 3.2-4  
    3.2-29  
    3.2-33  
    3.2-45b  
    3.7-19b  
    3.7-48b  
3.14-1 through 3.14-15  
3.15-1 through 3.15-15  
3.16-1 through 3.16-12  
    6.5-3  
    6.5-9  
    6.5-10  
    6.8-1  
    6.8-2  
    6.10-2  
    6.10-3  
6-11.3 through 6.11-11  
    6.14-1  
    6.14-2  
    6.15-1

APPENDIX B

1.0-1  
2.3-1 through 2.3-13  
    4.2-1  
4.3-1 through 4.3-12  
    4.3-13  
    5.1-1  
    5.2-1  
    5.3-1  
5.4-1 through 5.4-7  
    5.5-1