

NOV 10 1976

Docket, No.: 50-331

Iowa Electric Light and Power Company
ATTN: Mr. Duane Arnold
President
P. O. Box 351
Cedar Rapids, Iowa 52406

Gentlemen:

We have completed our review of Iowa Electric Light and Power Company (IELP) letter dated July 27, 1976 from Lee Liu, Vice President-Engineering, to George Lear, Division of Operating Reactors. The letter presented the IELP interpretation of eight items in the Environmental Technical Specifications (Appendix B to License DPR-49) for the Duane Arnold Energy Center. These eight items have caused disagreements in the past between the Office of Inspection and Enforcement and IELP.

With one exception we find that Iowa Electric's interpretation is acceptable and meets the intent of the Technical Specifications. The exception pertains to Item 8, the operability requirement of the off-gas radiation monitors (Specification 2.3.1.C.8).

The operability requirement of the off-gas radiation monitors in Specification 2.3.1.C.8 is for both the pre-treatment and post-treatment monitors, not just the post-treatment monitors as interpreted by Iowa Electric. Even though the Appendix A Technical Specifications 3.2.D.1.a and b on the off-gas monitors reference only the post-treatment monitors, the proper interpretation of the Appendix B Specification 2.3.1.C.8 is for both. The requirement applied on the pre-treatment monitor is necessary for a timely detection of failed fuel. The use of the post-treatment monitors for this purpose would result in a delay of several hours from event to detection. This delay is unacceptable. Consequently, the operability requirement of the pre-treatment monitor is a safety item and not environmental. As a matter of interest, this requirement should actually be located in Appendix A; however, the absence of such a requirement in Appendix A necessitates the interpretation of Specification 2.3.1.C.8 in Appendix B to include both the pre- and post-treatment monitors.

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As a result of the foregoing, we conclude that Specification 2.3.1.C.8 on the off-gas monitors should be interpreted to include both the pre- and post-treatment monitors until an Appendix A Technical Specification change can be completed to include this requirement.

Please contact us if there are further questions.

Sincerely,

George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

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