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 MCGAUGHY, R. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Application for amend to License DPR-49, consisting of
 Proposed Change RTS-203, incorporating normal-range radiation
 monitor located in low level radwaste processing & storage
 facility ventilation exhaust stack. Fee paid.

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Iowa Electric Light and Power Company

February 7, 1986

NG-86-0297

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
Technical Specification Change (RTS-203)
Low-Level Radwaste Processing and Storage
Facility (LLRPSF)
File: A-117, V-10

Dear Mr. Denton:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, Iowa Electric Light and Power Company hereby requests revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

This change will incorporate into the Technical Specifications the normal range radiation monitor located in the ventilation exhaust stack of the new Low-Level Radwaste Processing and Storage Facility (LLRPSF) at DAEC. Attachment 3 contains additional information regarding the LLRPSF and is provided for background purposes. This change will implement an additional control and has no potential to adversely affect the health or safety of the public.

The application (proposed change RTS-203) has been reviewed by the DAEC Operations Committee and DAEC Safety Committee. In accordance with the fee schedule for license amendments (10 CFR 170), a check for \$150 is enclosed. The balance of the fee will be paid upon billing.

Pursuant to the requirements of 10 CFR 50.91, a copy of this submittal, including the hazards considerations analysis, is being forwarded to our appointed state official.

8602130218 860207
PDR ADOCK 05000331
P PDR

*Rec'd w/ check
\$150.00*

ADD: BWR - L/BC's TECH SUPPORT

EB (LIAW)
PSB (L. HULMAN)
EICS (SRINIVASAN)
RSB (ACTING)
FOB (VASSALLO)

*A001
11*

Mr. Harold Denton
February 7, 1986
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This application, which consists of three signed originals and 37 copies with their 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 7th day of February 1986.

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

RWM/MJM/ta*

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92
2) Proposed Change RTS-203 including List of Affected Pages
3) LLRPSF Additional Information

cc: M. Murphy
L. Liu
L. Root
M. Thadani
NRC Resident Office
T. Houvenagle (ICC)

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Summary

This change will incorporate into the Technical Specifications the normal range radiation monitor located in the ventilation exhaust stack of the new Low-Level Radwaste Processing and Storage Facility (LLRPSF) at DAEC. This monitor provides protection as required by 10 CFR 50, Appendix A, General Design Criterion 64. This change will implement an additional control and has no potential to adversely affect the health or safety of the public.

The Low-Level Radwaste Processing and Storage Facility (LLRPSF) is being built in accordance with 10 CFR 50.59.

Section 3.15 of the DAEC Technical Specifications, which documents effluent monitoring requirements, was not in effect at the time the LLRPSF design package was initiated. Therefore, this change was not initiated at that time.

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. The piece of equipment being added to the Technical Specifications is a monitor and cannot increase the probability of an accident.

The monitor does, however, send a signal to close the LLRPSF exhaust vent upon detection of high activity levels and prevents exceeding 10 CFR 50 Appendix I limits. But this equipment is not safety-related and is located in a facility which is not safety-related (LLRPSF). The addition of this monitor does not increase the magnitude of the consequences of an accident or malfunction of safety-related equipment because it is not connected to any safety-related equipment and does not affect the operation of the plant.

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

Response:

No. The possibilities of an accident or malfunction have already been evaluated for identical monitors that are located in areas which contain safety-related equipment (reactor and turbine buildings). This monitor is located in a facility which is less critical (contains no safety-related equipment) than those already evaluated.

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

Response:

No. This non-safety-related monitor will be interconnected into the existing DAEC effluent monitoring system. The monitor does not reduce the margin of safety as defined in the Technical Specifications.

In the April 6, 1983 Federal Register, the NRC published a list of examples of amendments that are not likely to involve a significant hazards concern. Example number (ii) 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."

This proposed change falls into this category since it is the incorporation of a new radiation monitor into the Technical Specifications. Therefore, this proposed change does not contain a significant hazards consideration.