



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-49

IOWA ELECTRIC LIGHT AND POWER COMPANY  
CENTRAL IOWA POWER COOPERATIVE  
CORN BELT POWER COOPERATIVE

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 INTRODUCTION

On November 1, 1983, the NRC issued Generic Letter (GL) 83-36, "NUREG-0737 Technical Specifications." The letter requested that all nuclear power plant licensees revise their Technical Specifications to be consistent with the guidance contained in the generic letter. The licensee, Iowa Electric Light and Power Company (IELP), has closed out all of the issues addressed in the generic letter with the exception of Item III.D.3.4, "Control Room Habitability Requirements." By letter dated June 30, 1987, as revised September 1, 1989, IELP submitted proposed changes to the Duane Arnold Energy Center (DAEC) Technical Specifications (TSs) to more closely conform with the model TSs relating to control room habitability recommended in GL 83-36. Other minor editorial changes and clarifications were also proposed.

2.0 EVALUATION

The licensee has proposed changes to Sections 3.10, 4.10 and the associated Bases of the DAEC TSs. Most of the changes are editorial in nature, to properly reflect current plant nomenclature or to improve clarity. The most significant change is the revision of Surveillance Requirement 4.10.A.3, to demonstrate that a positive pressure can be maintained in the control room when the standby filter unit system is automatically isolated. Each of the proposed changes is discussed below, according to the page(s) on which it appears.

Pages iii and 3.10-1

The Table of Contents and text are revised to read "Remote Shutdown Panels" instead of "Emergency Shutdown Control Panel(s)." This change will reflect current plant nomenclature and design, as the Remote Shutdown Panels were installed to comply with 10 CFR Part 50, Appendix R, and effectively replaced the emergency shutdown control panels. Also, page iii includes a revised page number to reflect other changes and page 3.10-1 includes a minor grammatical correction. These editorial changes improve the clarity and accuracy of the TSs and are therefore acceptable.

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Pages 3.10-2 and 3.10-2a

Limiting Condition for Operation (LCO) 3.10.A.2.c is revised to read "...1000 cfm  $\pm$  10%," versus "...1000 cfm  $\pm$  100 cfm." This is a minor editorial change for consistency with other TSs and surveillance procedures and is therefore acceptable.

New LCOs 3.10.A.3.a., b and c replace existing LCOs 3.10.A.3 and 3.10.A.4. The new LCOs more clearly state the required actions for each operating mode when one or both of the main control room standby filter unit subsystems are inoperable. The new LCOs are consistent with the recommendations of GL 83-36 and are therefore acceptable.

Surveillance Requirements (SR) 4.10.A.2.b.c and d are also revised to more closely conform to the recommendations of GL 83-36. The revised SRs more explicitly identify the operability test requirements for the main control room standby filter unit subsystems. Therefore, these changes are acceptable.

Surveillance Requirement 4.10.3 is revised to explicitly require that once per operating cycle it is demonstrated that the main control room standby filter unit subsystems are automatically isolated and the control room is maintained at a positive pressure of at least 1/10 inch water gauge, upon receipt of a high radiation test signal at the air intake radiation monitors. This SR also closely conforms with the recommendation of GL 83-36 and clarifies the current general requirement. GL 83-36 recommends a minimum value of 1/8 inch water gauge to assure that a positive pressure exists in the control room. The revised SR for the DAEC specifies that a positive pressure of 1/10 inch water gauge under calm wind conditions ( $< 5$  mph) be maintained. The design of the DAEC control building ventilation system is such that a pressure of 1/8 inch cannot be maintained reliably; however, a pressure of 1/10 inch can be maintained. The intent of this surveillance requirement is to assure that the control room remains habitable and that radiation exposure to personnel remains less than 5 rem whole body following an accident, in accordance with 10 CFR Part 50, Appendix A, General Design Criterion 19. The staff believes that the proposed SR meets the goal of demonstrating a positive pressure differential sufficient to minimize potential inleakage of radiation into the control room following an accident, and is therefore acceptable.

LCO 3.10.B and SR 4.10.B are revised to reflect the nomenclature "Remote Shutdown Panels," as discussed above. The term "secured" is also replaced by the term "locked," to be more precise. These changes improve the clarity of the TSs and are therefore acceptable.

Pages 3.10.3 through 3.10-6

Pages 3.10-3 through 3.10-6 contain the Bases for sections 3.10 and 4.10 and are revised to reflect the changes to those sections. References to testing standards for charcoal adsorbers and HEPA filters were revised to refer to the DAEC Final Safety Analysis Report, thereby improving consistency. Other minor editorial changes to the Bases were made to improve clarity. The staff finds these changes acceptable.

In summary, the proposed changes will revise the DAEC TSs related to control room habitability to more closely conform with the NRC staff-recommended TSs in GL 83-36. The changes will also clarify the intent of current TSs and make other editorial improvements. Therefore, the staff finds the proposed changes acceptable.

### 3.0 ENVIRONMENTAL CONSIDERATIONS

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or a change to a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). This amendment also involves changes in record-keeping, reporting or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: April 26, 1990