

Iowa Electric Light and Power Company

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

July 28, 1993
NG-93-2607

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Request for Technical Specification Change
(RTS-259): Revision of 10 CFR 50 Reporting
Criteria

- References:
- 1) Generic Letter 86-10, Implementation of Fire Protection Requirements, dated April 24, 1986
 - 2) Letter, D. Mineck (IELP) to T. Murley (NRC), NG-90-0370, Annual Report of Facility Changes, Tests, Experiments, and Safety and Relief Valve Failures and Challenges, dated February 28, 1990
 - 3) Letter, D. Mineck (IELP) to T. Murley (NRC), NG-90-2842, RTS-167a, dated December 13, 1990

File: A-117

Dear Dr. Murley:

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

These changes will reflect revisions made to 10 CFR Part 50 by the NRC which were effective October 1, 1992 (57 FR 39353). Most of the changes are minor and administrative in nature, modifying reporting frequencies and due dates for various reports.

Other changes to reporting frequencies are being proposed as well. These changes will ensure consistency with current DAEC reporting practices and are discussed in Attachment 1. One non-TS related item is discussed below.

9308090336 930728
PDR ADOCK 05000331
P PDR

ADD 1

Dr. Thomas E. Murley
July 28, 1993
NG-93-2607
Page 2

Reference 1 requested licensees to report all changes to the fire protection program implemented under 10 CFR § 50.59 on an annual basis. Reference 2 subsequently submitted this information for DAEC as part of the "Annual Report of Facility Changes, Tests, Experiments, and Safety and Relief Valve Failures and Challenges." Fire protection requirements were later removed from TS as a result of Reference 3 and the subsequent approval and issuance of Amendment No. 190 to the DAEC license. IELP proposes to revise its commitment to provide this information on an annual basis. It will continue to be provided as part of the "Report of Facility Changes, Tests, Experiments, and Safety and Relief Valve Failures and Challenges", which will be submitted after each refueling outage vice annually.

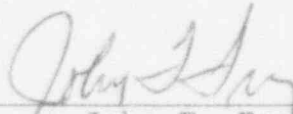
This application has been reviewed by the DAEC Operations Committee and DAEC Safety Committee. Pursuant to the requirements of 10 CFR § 50.91, a copy of this submittal, including the analysis which concludes that there are no significant hazards considerations, is being forwarded to our appointed state official.

Should you have any questions regarding this matter, please contact this office.

This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By



John F. Franz

Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 27th day of

July

, 1993, by

John F. Franz


Notary Public in and for the State of Iowa

June 8, 1995
Commission Expires

JFF/TWP/pjv



Dr. Thomas E. Murley
July 28, 1993
NG-93-2607
Page 3

Attachments: 1) Evaluation of Change With Respect to
10 CFR § 50.92
2) Proposed Change RTS-259 to the Duane Arnold
Energy Center Technical Specifications
3) Safety Assessment
4) Environmental Consideration

cc: T. Page
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
J. Martin (Region III)
S. Brown (State of Iowa)
NRC Resident Office
DCRC

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92Background:

As part of a Commission initiative to reduce the regulatory burden on nuclear licensees, the NRC amended 10 CFR Part 50 last year (57 FR 39353).

The impact on the DAEC TS includes changes in reporting frequencies and due dates for the "Radioactive Material Release Report" and "Report of Facility Changes, Tests, Experiments, and Safety and Relief Valve Failures and Challenges." Other proposed changes to reporting frequencies are discussed below.

One of the action plan items developed as a result of the TMI-2 accident was the reporting of safety and relief valve failures and challenges, both promptly and annually (Reference 1). IELP has included the annual report in its "Annual Report of Facility Changes, Tests, Experiments, and Safety and Relief Valve Failures and Challenges." Revised 10 CFR § 50.59 permits reporting changes, tests, and experiments after each refueling outage. IELP proposes to report safety and relief valve information on the same frequency and in the same report. Recent history at the DAEC regarding safety and relief valve failures and challenges has demonstrated consistent and acceptable performance of the relief valves; thus, the change in reporting frequency should have no negative impact.

Reference 2 requested the relocation of the Radiological Effluent Technical Specifications to the Offsite Dose Assessment Manual (ODAM) and Process Control Program (PCP) in accordance with the guidance provided in Reference 3. This was subsequently approved by Amendment No. 184. Amendment No. 184 included the requirement to submit a copy of the ODAM to the NRC, as part of the Semianual Radioactive Material Release Report, showing any changes to the ODAM for the period of the report. The enclosed TS revision proposes to change the TS to match the revised requirement of 10 CFR § 50.36a which makes the Radioactive Material Release Report an annual submittal. IELP also proposes to submit a copy of the ODAM when required as part of this annual report.

Iowa Electric Light and Power Company, Docket No. 50-331,
Duane Arnold Energy Center, Linn County, Iowa
Date of Amendment Request: July 28, 1993

Description of Amendment Request:

The proposed license amendment incorporates the requirements outlined in the revised 10 CFR Part 50 and incorporates other administrative changes to ensure consistency in reporting.

The proposed amendment revises the reporting frequency of various reports based on recent changes to 10 CFR Part 50. These changes include the following:

- revising the semiannual Radioactive Material Release Report to annual.
- revising the reporting frequency of facility Changes, Tests and Experiments to match the reporting frequency of the FSAR update (within six months after the Refueling Outage).

Other proposed changes include the following:

- revising the frequency for reporting safety and relief valve failures and challenges to coincide with the frequency of reporting facility Changes, Tests and Experiments (within six months after the Refueling Outage). This permits inclusion of all the information in one report.
- revising the frequency for reporting changes to the ODAM from semiannually to annually. This permits the ODAM to be part of the Radioactive Material Release Report.

Basis for proposed no significant hazards consideration:

The Commission has provided standards (10 CFR § 50.92(c)) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

After reviewing this proposed request for Technical Specification change, we have concluded:

- 1) Operation of the facility in accordance with the proposed amendment would not involve any increase in the probability of occurrence or consequences of an accident previously evaluated because the changes only affect reporting

frequencies and do not impact actual plant operation.

- 2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The changes are administrative in nature and do not alter the operation of any plant systems.
- 3) Operation of the facility in accordance with the proposed amendment would not involve any reduction in a margin of safety. The changes do not alter any plant systems or their operation. The changes are administrative in nature.

The proposed changes will not increase the probability or consequences of any previously analyzed accident, introduce any new or different kind of accident, or reduce any existing margin of safety.

Based upon the above, we have determined that the proposed Amendment will not involve a significant hazards consideration.

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401

Attorney for Licensee: Jack Newman, Kathleen H. Shea, Newman and Holtzinger, 1615 L Street NW, Washington, D.C. 20036

References:

1. NUREG 0737, Item II.K.3.3, Reporting Relief Valve and Safety Valve Failures and Challenges
2. Letter, D. Mineck (IELP) to T. Murley (NRC), NG-91-3675, RTS-231, dated December 20, 1991
3. Generic Letter 89-01, Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program, dated January 31, 1989

PROPOSED CHANGE RTS-259 TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend Appendix A (Technical Specifications) to said license by deleting certain current pages and replacing them with the attached new pages. The List of Affected Pages and a Description of Changes is given below.

LIST OF AFFECTED PAGES

6.11-3
6.11-6*
6.11-7
6.14-1*

*This page is common to RTS-258.

SUMMARY OF CHANGES:

The following list of proposed changes is in the order that the changes appear in the Technical Specifications.

<u>Page</u>	<u>Description of Changes</u>
6.11-3	Submittal of the report documenting safety and relief valve failures and challenges is changed from annually to within 6 months after each Refueling Outage. This revision reflects a change to 10 CFR Part 50 which makes the submittal of the "Radioactive Material Release Report" an annual requirement. In addition, a minor wording change is made for consistency purposes.
6.11-6	The frequency for the reporting of safety and relief valve challenges is changed from yearly to within 6 months after each Refueling Outage.
6.11-7	The frequency for reporting Changes, Tests and Experiments is revised to within 6 months after each Refueling Outage, consistent with 10 CFR Part 50. The frequency and due date of the "Radioactive Material Release Report" are changed to be consistent with the changes made on page 6.11-3.
6.14-1	The change reflects the revised annual reporting requirement and revises the report title to be consistent with other areas of the TS and administrative procedures.

SAFETY ASSESSMENTIntroduction

By letter dated July 28, 1993, Iowa Electric Light and Power Company (IELP) submitted a request for revision of the Technical Specifications, Appendix A to Operating License No. DPR-49, for the Duane Arnold Energy Center (DAEC). The proposed change would revise various reporting requirements to be consistent with revisions of Part 50. In addition, the proposed change would make various other administrative changes.

Assessment

The changes are minor and administrative in nature. These changes revise reporting frequencies and due dates for various reports, consistent with the revised 10 CFR Part 50. The reduced reporting frequencies result in a reduction in burden to the licensee, and due to the administrative nature of the changes, there would be no reduction in the protection of the public health and safety. The public health and safety determination appears in a document entitled "Report on Special Review of Existing NRC Regulations by the Committee to Review Generic Requirements", issued on April 13, 1992.

Other reporting frequency changes will enable DAEC to continue current reporting practices, and again, are administrative in nature.

Based on the above evaluation, we conclude that the proposed Technical Specification changes are acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR § 51.22(c)(9) identifies certain licensing and regulatory actions eligible for categorical exclusion from the requirements for an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (3) result in an increase in individual or cumulative occupational radiation exposure. Iowa Electric Light and Power has reviewed this request and determined that the proposed amendment meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the amendment. The basis for this determination follows:

Basis

The change meets the criteria for categorical exclusion set forth in 10 CFR § 51.22(c)(9) for the following reasons:

1. As demonstrated in Attachment 1, the proposed amendment does not involve a significant hazards consideration.
2. The proposed changes to reporting frequencies will have no effect on the types or amounts of effluents released offsite.
3. The proposed changes to reporting frequencies will have no effect on individual or cumulative occupational radiation exposures.