Iowa Electric Light and Power Company

January 6, 1994
NG-93-5097

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

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
Response to Staff Concerns on License Amendment Request RTS-246

Reference: 1) Letter, J. Franz (IELP) to Dr. T. Murley (NRC), NG-92-1238 dated March 27, 1992
2) Letter, R. Pulsifer (NRC) to L. Liu (IELP), dated November 12, 1993

File: A-117

Dear Dr. Murley:

This letter provides our response to your Staff's concerns (Reference 2) regarding our request (Reference 1) for a license amendment for the Duane Arnold Energy Center (DAEC). Our responses to the specific concerns are included as an Attachment to this letter.

Should you have any additional questions, please contact this office.

Sincerely,

240206

John F. Franz
Vice President, Nuclear

JFF/CJR/pjv

Attachment: Response to Staff Concerns on RTS-246

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

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Response to Staff Concerns on RTS-246

NRC Concern 1:

While the DAEC FSAR Section 6.5 states that the secondary containment is maintained at a negative 1/4-inch of water pressure during normal operation, there is no requirement in either the existing or proposed TS to periodically verify this negative pressure. Further, the TS do not specify or require testing to verify the maximum time for SGTS operation to achieve the 1/4-inch of water vacuum in secondary containment. These are shortcomings in the TS which the licensee should be urged to correct.

IELP Response:

The design features of the secondary containment are described in Technical Specification (TS) Section 5.4.2 and UFSAR Section 6.2.1. These safety design bases are periodically confirmed per our Reference 1 submittal.

In addition, the referenced UFSAR Section (6.5.3.3) contains a description of the operation of the Standby Gas Treatment (SBGT) System. This section includes recommendations from GE "Design Recommendations for Standard BWR Plants," August, 1968. The maintenance of a negative 1/4-inch of water pressure is one of those recommendations.

During normal plant operations, negative pressure in the secondary containment is not assumed by any of the DAEC's accident analyses, nor is attainment of a negative 1/4-inch of water pressure required within a given time interval to mitigate the consequences of any accident. Although there is the capability to maintain a negative 1/4-inch of water pressure upon secondary containment isolation, a specific drawdown time is not assumed in any DAEC design or licensing bases.

Since specific values for secondary containment pressure and drawdown time are not DAEC design or licensing bases requirements, this information will be removed from UFSAR Section 6.5.3.3. The UFSAR will be revised to reflect the current system design. This revision will be accomplished when the UFSAR is updated for the current operating cycle.

We agree that maintaining secondary containment at a negative pressure with respect to the atmosphere is a good operating practice. We make every attempt to maintain a negative pressure, though no specific value is maintained.

NRC Concern 2:

The Bases for new TS sections 3.7.B and 4.7.B include an added discussion of the actions to be taken in the event that one or more primary containment isolation valves are inoperable. In general, this is an improvement. However, the discussion includes use of "a check valve inside primary containment with flow through the valve secured" as an acceptable isolation barrier. These words are not consistent with TS 3.7.B and should be corrected.

IELP Response:

Technical Specification 3.7.B.2 will be revised to delete specific details on methods to isolate penetrations. This specific information will remain only in the Bases. This revision will be submitted for Staff review by March 31, 1994.

NRC Concern 3:

The Bases for Section 3.7.L and 4.7.L in the proposed revised TS, which have not been changed from the Bases of the existing DAEC TS, state that "...air distribution (across the HEPA filter bank) should be determined annually..." However, proposed revised TS 4.7.L.1.c requires an air distribution demonstration to be performed "after each complete or partial replacement of a HEPA filter bank or after any structural maintenance on the system housing." The Bases should be revised to support the revised requirement for the air flow demonstration.

IELP Response:

We agree that this section should be revised. These Bases will be changed to support the revised requirement for air flow distribution demonstration. This revision will be submitted for Staff review by March 31, 1994.