

IES
UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear
NG-94-0389
May 6, 1994

Mr. William Russell, 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-261): Revision to Technical
Specification Section 3.6., "Primary
System Boundary"
File: A-117

Dear Mr. Russell:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, IES Utilities Inc. hereby requests revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

The proposed revision deletes information from DAEC's Technical Specifications Surveillance Requirements and Bases Section which explains the interval dates for the ASME inservice inspection (ISI) program. This amendment also adds clarification, deletes reference to the ASME edition and addenda requirements to be addressed by the ISI program and deletes information that is vague or no longer necessary from the Bases Section of DAEC's Technical Specifications which pertains to the ASME ISI program.

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

We request that you complete your review of this submittal by January 15, 1995 in order to support our next refueling outage, which is scheduled to start on February 24, 1995.

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

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

IES Utilities Inc.

By John F. Fiane
John F. Fiane
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 5th day of May,
1994, by John G. Granz.

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

September 28, 1995
Commission Expires

JFF/DEB/pjv

Attachments: 1) Evaluation of Change With Respect to
10 CFR 50.92
2) Proposed Change RTS-261 to the Duane Arnold
Energy Center Technical Specifications
3) Safety Assessment
4) Environmental Consideration

cc: D. Barta
L. Liu (w/o)
L. Root (w/o)
R. Pulsifer (NRC-NRR)
J. Martin (Region III)
S. Brown (State of IA)
NRC Resident Office
DCRC

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92Background:

The proposed changes contained in this submittal which delete reference to the ISI program interval dates will allow for DAEC's current ISI program interval to be extended in accordance with the ruling in Federal Register 57 FR 34666 dated August 6, 1992.

The proposed changes will clarify that inspections will meet ASME Section XI requirements. Therefore, some of the information in the TS Bases which is deleted by this change is considered vague or no longer necessary.

IES Utilities Inc., Docket No. 50-331,
Duane Arnold Energy Center, Linn County, Iowa
Date of Amendment Request: May 6, 1994

Description of Amendment Request:

This request revises DAEC TS Surveillance Requirements Section 4.6.G, "Primary System Boundary Structural Integrity", by deleting the Surveillance Requirement (SR) which refers to the ISI program interval. The proposed changes also revise DAEC TS Section 3.6.G and 4.6.G Bases, "Reactor Coolant System Structural Integrity," pages 3.6-36 and 3.6-37, by adding clarification, deleting explanations of the interval dates for the ISI program, deleting reference to the ASME edition and addenda requirements to be addressed by the ISI program and deleting information that is vague or no longer necessary.

The changes which delete reference to the ISI program interval dates will make DAEC's TS consistent with comparable specifications in the Improved Standard Technical Specifications (NUREG-1433).

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.

In reviewing this proposed request for Technical Specifications change, we have reached these conclusions:

- 1) The proposed revision does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed revision does not change any accident analysis, plant safety analysis or calculations, degrade existing plant programs, or modify any functions of safety related systems or accident mitigation functions DAEC has previously been credited with. The ISI program will continue to conform with the ASME Code and approved relief requests. Therefore, the proposed revision does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) The proposed revision does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed revision does not alter any plant parameters, revise any safety limit setpoint, or provide any new release pathways. In addition, the proposed revision does not modify the operation or function of any safety related equipment, nor introduce any new modes of operation, failure modes, or physical changes to the plant. The proposed revision does not change any transient responses assumed in the Design Bases of the plant. Therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) The proposed revision will not significantly reduce any margin of safety.

The proposed revision does not require any modifications to existing plant systems or equipment, Emergency Operating Procedures, safety limit settings, or parameters utilized in the licensing bases for the safety analysis. The proposed revision does not change any safety analysis or any accident mitigation actions for which DAEC has previously taken credit. Therefore, the proposed revision will not significantly reduce any margin of safety.

RTS-261

Attachment 1 to
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Based upon these conclusions, we have determined that the proposed revision does 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, Bouknight & Edgar, P.C., 1615 L Street NW, Washington, D.C. 20036-5610

PROPOSED CHANGE RTS-261 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 revising the attached pages as indicated. The list of affected pages is given below.

List of Affected Pages

3.6-8*
3.6-36*
3.6-37*

* Affected by RTS-197A, submitted June 4, 1993 (NG-93-2104)

Summary of Changes:

The following is a description of the proposed amendment. The specific page number, listed in the left margin, represents the existing TS page number.

<u>Page</u>	<u>Description of Change</u>
3.6-8	Delete SR 4.6.G.1.a. This sentence refers to the commencement date of the second 10-year interval for the ISI program.
3.6-36	Delete the first two paragraphs which explain the inspection intervals for the inservice inspection program and specify the ASME edition and addenda requirements to be addressed by the ISI program. Add clarification to the third paragraph by changing "Visual inspections" to "Visual examinations". Add clarification by changing "critical systems" to "ASME Section XI Class 1, 2 and 3 systems", since these are the systems that are examined. Delete information which is vague or no longer necessary. Add clarification to the fourth paragraph by changing "inspection" to "examination" and "expected defect" to "potential defect".
3.6-37	In the first paragraph, change "Surface inspections" to "Surface examinations" and "Ultrasonic testing" to "Ultrasonic examination" for clarification.