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IES UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear

May 27, 1994
NG-94-0794

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
(RTS-246A): "Revision to RTS-246"
Reference: 1) Letter, J. Franz (IELP) to
Dr. T. Murley (NRC), NG-92-1238
dated March 27, 1992; Subject: RTS-
246: Revision to TS Section 3.7,
"Containment Systems"
2) Letter, J. Franz (IES) to W.
Russell (NRC), NG-94-1107 dated
March 30, 1994
File: A-117, T-23a

Dear Mr. Russell:

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

Reference 1 transmitted a proposed revision (RTS-246) to Section 3.7 of the DAEC TS. Reference 2 stated that we would submit a revision to RTS-246 by May 30, 1994.

Ten pages of the Technical Specifications which were included in the RTS-246 submittal have been revised. These ten pages are included in the attachment and are denoted as RTS-246A. These pages supercede the corresponding ten pages in the original (Reference 1) RTS-246 submittal. The revision does not affect the conclusions stated in the original submittal that there is no

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significant hazards consideration and that the amendment requires no environmental assessment or environmental impact statement.

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 is being forwarded to our appointed state official.

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

IES UTILITIES INC.

By John Franz
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 27th day of May,
1994, by John F. Franz.



Mary Michele O'Neal
Notary Public in and for the State of Iowa
June 8, 1995
Commission Expires

JFF/CJR/pjv

Attachment: Revision (RTS-246A) to Proposed Change (RTS-246) to the
Duane Arnold Energy Center Technical Specifications

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

REVISION (RTS-246A) TO PROPOSED CHANGE (RTS-246)
TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center hereby revise the previous (March 27, 1992) request to amend Appendix A (Technical Specifications) to said license. These changes further revise Technical Specification pages affected by the original submittal. The pages listed below are to be deleted from the original submittal and replaced with the attached pages.

List of Affected Pages

3.7-7
3.7-8
3.7-11
3.7-18
3.7-19
3.7-28
3.7-29
3.7-37
3.7-38
3.7-39

Summary of Changes Proposed by this Revision (RTS-246A):

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

<u>Page</u>	<u>Description of Changes</u>
3.7-7	As discussed in the NRC's Technical Evaluation Report (TER) of RTS-246, the change originally requested would add a discussion to the Bases for TS Sections 3.7.B and 4.7.B. This discussion includes the use of "a check valve inside primary containment with flow through the valve secured" as an acceptable isolation barrier. Since this method is not discussed in TS Section 3.7.B of RTS-246, an inconsistency would be created between the Bases and TS Section 3.7.B.2. To correct this inconsistency, TS Section 3.7.B.2 has been revised to delete specific details on methods to isolate penetrations. This specific information will remain in the Bases only. This change is intended to be consistent with draft Improved Standard Technical Specifications. The associated footnote has also been revised accordingly.
3.7-8	TS Section 3.7.B.2.c has been deleted to be consistent with the Bases as discussed above for page 3.7-7. The associated

footnote was also deleted.

- 3.7-11 TS Section 3.7.E has been revised to clarify drywell-pressure suppression chamber vacuum breaker requirements. TS Sections 3.7.E.1 and 3.7.E.2 have been revised to clarify that only six of the seven vacuum breakers are required. Primary containment integrity is not impaired if one vacuum breaker is inoperable for opening but is secured in the closed position with the remaining six vacuum breakers operable.
- A footnote has been added to TS Sections 3.7.E.1 and 3.7.E.3 to clarify when vacuum breakers must be closed.
- Also, the adjective "closed" has been added to TS Sections 3.7.E.4 and 3.7.E.4.a for clarification. In TS Section 3.7.E.4.a, "vacuum breaker's" has been added for clarification.
- 3.7-18 TS Section 3.7.K.2 has been revised to delete specific details on methods to isolate penetrations. This specific information remains only in the Bases. The associated footnote has also been revised accordingly. This change makes the format of Section 3.7.K consistent with Section 3.7.B.
- 3.7-19 A typographical error in Section 4.7.L.1.a has been corrected.
- 3.7-28 The Bases have been corrected to be consistent with TS
3.7-29 3.7.E.2.
- 3.7-37, References to "SCIVs" in the Bases have been changed to
3.7-38 "secondary containment isolation valves/dampers" to be consistent with TS Section 3.7.K. References to "valves" have been changed to "valves/dampers" to eliminate potential confusion.
- 3.7-39 As discussed in the TER, the original submittal (RTS-246) proposed revising TS Section 4.7.L.1.c. The surveillance frequency for demonstrating uniform air distribution across the HEPA filters was changed from "annually" to "after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing." However, as submitted, RTS-246 did not request changing the Bases for Section 3.7.L and 4.7.L to correspond to these revised requirements. To correct this inconsistency, this revision (RTS-246A) proposes changing the Bases to support the revised requirement for air flow demonstration.