

PROPOSED CHANGE RTS-268 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 below.

LIST OF AFFECTED PAGES

6.5-8
6.8-2

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>
6.5-8	Revise 6.5.2.8.a, b, c and d to clarify the requirements and to make them consistent with Regulatory Guide 1.33.
	Delete the requirement for Safety Committee involvement in the audits of the Emergency Plan and Security Plan consistent with Generic Letter 93-07.
6.8-2	Capitalize the defined term OPERATING CYCLE in 6.8.1.11.
	Add provision to allow the Plant Superintendent-Nuclear to designate signatory authority for procedure approval in Sections 6.8.2 and 6.8.3.

These changes are consistent with the BWR/4 Draft Improved Technical Specifications, NUREG-1433.

- i. Reports and meeting minutes of the Operations Committee.

6.5.2.8 Audits

Audits of facility activities shall be performed under the cognizance of the Safety Committee. These audits shall encompass:

- a. The conformance of facility operation to ~~all~~ provisions contained within the Technical Specifications and applicable license conditions at least once per ¹²~~24~~ months.
- b. The performance, training and qualifications of the ~~entire~~ facility staff at least once per 24 months.
- c. The results of ~~all~~ actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of ~~all~~ activities required by the Quality Assurance Program to meet the criteria of Appendix "9", 10CFR50, at least once per 24 months.
- e. ~~The Emergency Plan and implementing procedures at least once per 12 months.~~
- f. ~~The Security Plan and implementing procedures at least once per 12 months.~~

8. Procedures required by the plant Security Plan.
9. Operation of radioactive waste systems.
10. Fire Protection Program implementation.
11. A preventive maintenance and periodic visual examination program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient to as low as practical levels. This program shall also include provisions for performance of periodic systems leak tests of each system once per ~~operating cycle.~~ ^{OPERATING CYCLE.}
12. Program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions, including training of personnel, procedures for monitoring and provisions for maintenance of sampling and analysis equipment.
13. Administrative procedures for shift overtime for Operations personnel to be consistent with the Commission's June 15, 1982 policy statement.
14. OFFSITE DOSE ASSESSMENT MANUAL.
15. PROCESS CONTROL PROGRAM.
16. Quality Control Program for effluents.

6.8.2 Procedures described in 6.8.1 above, and changes thereto, shall be reviewed by the Operations Committee as indicated in Specification 6.5.1.6 and approved by the Plant Superintendent-Nuclear ^{or designee} prior to implementation, except as provided in 6.8.3 below.

6.8.3 Temporary minor changes to procedures described in 6.8.1 above which do not change the intent of the original procedure may be made with the concurrence of two members of the plant management staff, at least one of whom shall hold a senior operator license. Such changes shall be documented and promptly reviewed by the Operations Committee and by the Plant Superintendent-Nuclear ^{or designee} subsequent incorporation, if necessary, as a permanent change, shall be in accord with 6.8.2 above.

Safety AssessmentIntroduction

By letter dated June 30, 1994, IES Utilities Inc. (IES) submitted a request for revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed changes will improve the effectiveness of the organization supporting DAEC by eliminating unnecessary administrative burden. The specific changes are to clarify the Safety Committee Audit requirements in Section 6.5.2.8.a, b, c, and d; delete the requirement for Safety Committee involvement in audits of the Emergency and Security Plans in Section 6.5.2.8.e and f; and to add provision for the Plant Superintendent-Nuclear designation of signature authority for approval of plant procedures in Sections 6.8.2 and 6.8.3. These changes are consistent with the draft Improved Technical Specifications for BWR/4 plants, NUREG-1433 and the guidance contained in Generic Letter 93-07.

Assessment

The proposed changes to DAEC TS will simplify administrative requirements. The changes to the audit requirements will allow more focused reviews by the Safety Committee, thereby increasing effectiveness. The allowance for designation of authority for procedural approval will relieve the Plant Superintendent-Nuclear of the burden of approving all plant procedure changes.

These changes will not result in any degradation of administrative controls. They will result in simplifications of existing processes which will ultimately allow more focused audits and procedure reviews at a more appropriate level.

Based on the above information, we have concluded that the proposed changes to the DAEC TS are acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions which are eligible for categorical exclusion from the requirement to perform 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. IES Utilities Inc. has reviewed this request and determined that the proposed amendment meets the eligibility 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 issuance of the amendment. The basis for this determination follows:

Basis

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

1. As demonstrated in Attachment 1 to this letter, the proposed Amendment does not involve a significant hazards consideration.
2. The proposed Amendment includes changes to the Administrative Controls section. No changes in plant design or operational strategies will be made as a result of these changes; thus, there will be no increase in either the types or amounts of effluents that may be released offsite.
3. The proposed Amendment includes changes to the Administrative Controls section requirements for audits and procedure reviews. No changes in either plant design or operational strategies will be made as a result of these changes; thus, there will be no significant increase in either individual or cumulative occupational exposure.