



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-49

IOWA ELECTRIC LIGHT AND POWER COMPANY
CENTRAL IOWA POWER COOPERATIVE
CORN BELT POWER COOPERATIVE

DUANE ARNOLD ENERGY CENTER

DOCKET NO. 50-331

1.0 INTRODUCTION

By letter dated September 20, 1991, Iowa Electric Light and Power Company (the licensee) requested an amendment to Facility Operating License No. DPR-49 for the Duane Arnold Energy Center (DAEC). The proposed amendment would remove the Technical Specifications (TS) tables that include lists of components referenced in individual specifications. In addition, the TS requirements have been modified such that all references to these tables have been removed. Finally, the TS have been modified to state requirements in general terms that include the components listed in the tables removed from the TS. Guidance on the proposed TS changes was provided by Generic Letter (GL) 91-08, dated May 6, 1991.

2.0 EVALUATION

Deletion of Tables

The licensee has proposed the removal of Table 3.7-1, "Containment Penetrations Subject to Type B Test Requirements," and Table 3.7-2, "Containment Isolation Valves Subject to Type C Test Requirements." References to these tables in TS 4.7.A.2.b and 4.7.A.2.c, respectively, are also being deleted since, with the removal of the tables, deletion of the references is also necessary. The component lists formerly contained in the two tables will be incorporated into plant procedures that are subject to the change control provisions for plant procedures in the Administrative Controls Section of the TS. This is an acceptable alternative to identifying each component by its plant identification number in these two tables since the change control provisions of the TS provide an adequate means to control changes to these component lists although the lists are not in the TS. The removal of these tables of component lists is acceptable because it does not alter existing TS requirements or those components to which they apply. Although the above component lists are not specifically described in Generic Letter 91-08, the licensee's proposal to remove them from the TS is based on the guidance in the GL. TS Section 4.7.A.2 contains appropriate descriptions of the scope of the components to which the removed TS requirements

apply. Since regulatory requirements and guidance further define the components and the testing involved and the Bases Section of the TS already references the applicable requirements, no further clarification is required.

Section 4.7.A.2.e has been modified to add the requirement to verify that the mechanical modification which limits the maximum opening angle is intact when performing Type C testing on purge isolation valves. This requirement was formerly contained in Note 5 to Table 3.7-2 and is in addition to the TS requirements. The modification to Section 4.7.A.2.e contains specific valve numbers. However, the GL guidance states that, if practical, valves should be identified by function rather than by component number. For this proposed change, there are other purge isolation valves to which the above requirement does not apply because the valves differ in design. It is, therefore, not practical to identify these valves solely by function. The change is consistent with the guidance of GL 91-08, and is acceptable.

The licensee has also proposed the removal of Table 3.7-3, "Primary Containment Power Operated Isolation Valves," that is referenced in TS 3.2 Bases, 3.7.D.1, 4.7.D.1.b.1, and 3.7.D.2. The addition of a limiting condition for operation that addresses the operability of containment isolation valves is not necessary since TS Section 3.7.D.1 already contains the requirement that:

During reactor power operating conditions, all primary containment isolation valves and all instrument line flow check valves shall be OPERABLE except as specified in 3.7.D.2.

This states the operability requirements in general terms that apply to all containment isolation valves including those that are locked or sealed closed. These valves would be locked or electrically deactivated in the isolated position or blind flanged consistent with the regulatory requirements for manually-operated valves that are used as containment isolation valves. Removal of Table 3.7-3 from the TS is consistent with the guidance of GL 91-08 and is, therefore, acceptable.

Two footnotes have been added as references of Sections 4.7.D.1.a and 4.7.D.1.b.1. These footnotes were formerly a Note in Table 3.7-3. Their addition is necessary because their content provides exceptions to TS requirements. Their addition is consistent with the guidance of GL 91-08 and is, therefore, acceptable.

There were other Notes in Tables 3.7-1, 3.7-2 and 3.7-3 that were not added to TS Sections because they were for information only and did not alter any TS requirements. Their removal would therefore not affect the applicability of the TS requirements and their addition to TS Sections is not necessary. This is in accordance with the guidance of GL 91-08 and is, therefore, acceptable.

Intermittent Operation of Valves

Intermittent operation under administrative control of valves which are locked or electrically deactivated in the isolated position or blind flanged is already addressed in the following footnote referenced in Section 3.7.D.2.

Isolation valves closed to satisfy these requirements may be reopened on an intermittent basis under administrative control.

The definition of administrative control has been added to the 3.7.A Bases. This definition is consistent with the guidance in GL 91-08 and is, therefore, acceptable.

Editorial and Clarification Changes

In Section 3.7.A.2, a sentence has been added that states that compliance with Subsection 3.7.D.2 is a means of satisfying the requirement to maintain primary containment integrity. This statement was added to clarify that if a primary containment isolation valve is inoperable, and the actions of Section 3.7.D.2 are performed, the requirement to maintain primary containment integrity in Section 3.7.A.2 has been satisfied for the penetration in which the inoperable primary containment isolation valve is located. The added statement is a clarification and does not alter existing TS requirements or the components to which it applies, and is, therefore, acceptable.

A footnote below Section 4.7.D that defines an operating cycle has been deleted, since an operating cycle is clearly defined in Section 1.0. This is an editorial change that does not modify any TS requirements or plant equipment and is, therefore, acceptable.

In 3.2 Bases, references to Specification 3.7 for required closing times and isolation valve closure group have been deleted since with the deletion of the Tables, this information is no longer contained in the TS. These changes are made for consistency and are acceptable.

The one time exemption footnotes referenced in Sections 4.7.A.2.d.2)a), 4.7.A.2.d.3) and 4.7.A.2.e have been deleted since the exemptions have expired and the footnotes are no longer needed. These are editorial changes and are acceptable.

In the 3.7 Bases, a reference to the plant Administrative Control Procedures was added to indicate that this is the location of the lists of testable components and primary containment power operated isolation valves. This is in accordance with the guidance of GL 91-08 and is acceptable.

The licensee has proposed changes to the above TS that are consistent with the guidance provided in GL 91-08. In addition, the licensee has provided an updated copy of the Bases Section of TS 3.7.A that addresses appropriate considerations

for opening locked or sealed closed valves on an intermittent basis. Finally, the licensee has confirmed that component lists removed from the TS have been updated to identify all components for which the TS requirements apply and are located in controlled plant procedures.

On the basis of the above review, the staff finds that the proposed changes to the TS for the Duane Arnold Energy Center are primarily administrative in nature and do not alter the requirements set forth in the existing TS. However, the applicability of the operability requirements will extend to all containment isolation valves as noted in this evaluation. Overall, these changes will allow the licensee to make corrections and updates to the list of components for which these TS requirements apply, under the provisions that control changes to plant procedures as specified in the Administrative Controls Section of the TS. Therefore, the staff finds that the proposed TS changes are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Iowa State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATIONS

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (56 FR 55947). Accordingly, the 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 need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: March 11, 1992