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John F. Franz, Jr.  
Vice President, Nuclear

December 15, 1995  
NG-95-3413

Mr. William T. Russell, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Request for Technical Specification Change (RTS) 285A  
Emergency Diesel Generator Conditional Surveillance and Editorial  
Clarifications

References: 1) RTS-285, dated July 21, 1995, NG-95-2067  
2) Letter, Young (IES) to Russell (NRC), dated August 8, 1995, NG-95-2482

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 amends our previously submitted request for revision to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC) (RTS-285, Reference 1).

This application has been reviewed by the DAEC Operations Committee and the Safety Committee. A copy of this submittal, along with the analysis of No Significant Hazards Considerations, is being forwarded to our appointed state official pursuant to 10 CFR Section 50.91.

In Reference 1, we requested revisions to the DAEC TS to modify the requirements for testing an emergency diesel generator when the other is inoperable. During its review of that request, the NRC suggested an improvement of the submittal such that it would conform to the requirements of the Improved Standard TS, NUREG-1433, Revision 1. These changes have been incorporated and are being submitted as a revision to RTS-285 (RTS-285A).

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In Reference 2, we notified the staff of an editorial error in the DAEC Operating License and requested a correction. While processing that request, NRC staff requested an evaluation in accordance with 10 CFR 50.92. We have incorporated the change requested in Reference 2 into this change request (RTS-285A) and included the evaluation.

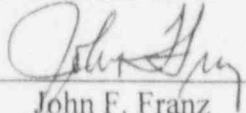
Additionally, two other revisions have been incorporated into this change request. One is to correct an erroneous reference in the TS and the other removes the proposed TS limit on enrichment of new fuel. The erroneous reference was introduced during previous TS changes and the limit on new fuel was proposed in RTS-285, but is unnecessary in view of the NRC-approved GE Standard Application for Reactor Fuel (GESTAR).

This letter transmits RTS-285A, which consists of RTS-285 with revisions indicated by revision bars in the margin. The Environmental Consideration was not affected, but is included for completeness.

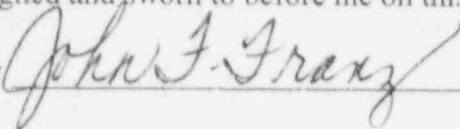
Should you have any questions regarding this matter, please contact this office.

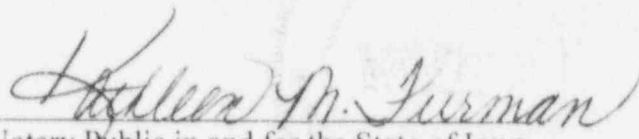
This letter is true and accurate to the best of my knowledge and belief.

IES UTILITIES INC.

By   
John F. Franz  
Vice President, Nuclear

State of Iowa  
(County) of Linn

Signed and sworn to before me on this 14<sup>th</sup> day of December, 1995,  
by .

  
Notary Public in and for the State of Iowa  
September 28, 1998  
Commission Expires

Mr. William T. Russell

NG-95-3413

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- Attachments:
- 1) Evaluation of Change Pursuant to 10 CFR Section 50.92
  - 2) Proposed Change RTS-285A to the Duane Arnold Energy Center  
Technical Specifications
  - 3) Safety Assessment
  - 4) Environmental Consideration

JFF/SRC/smz

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cc: S. Catron  
L. Liu  
B. Fisher  
G. Kelly (NRC-NRR)  
H. Miller (Region III)  
S. Brown (State of Iowa)  
NRC Resident Office  
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EVALUATION OF CHANGE PURSUANT TO 10 CFR SECTION 50.92Background:

IES Utilities has identified some administrative improvements for the Duane Arnold Energy Center (DAEC) Operating License (OL) and Technical Specifications (TS). These changes would correct erroneous references in the OL and in TS Section 3.8, eliminate an inappropriate conditional surveillance in Section 4.5 and 4.8, clarify the requirements governing spent and new fuel storage in Section 5.5 and eliminate Operations Committee reviews of procedures in support of the DAEC Emergency Plan and Security Plan, as specified in Sections 6.5 and 6.8. The proposed changes are consistent with the Improved Standard TS (NUREG 1433) and NRC Generic Letters 93-05 and 93-07.

IES Utilities Inc., Docket No. 50-331,  
Duane Arnold Energy Center, Linn County, Iowa  
Date of Amendment Request: December 15, 1995

Description of Amendment Request:

OL section 2.C(4) includes an erroneous reference. This paragraph was added by Amendment 47 in support of the recirculation safe end replacement. The proposed revision corrects that paragraph by adding references to the letters submitted to obtain that change.

TS Section 3.8.B.2.c refers to Section 3.7.D erroneously. The correct reference should be to 3.7.B for the 250 VDC power operated isolation valves. This amendment request would make that correction.

TS Section 4.8.E.2 states the surveillance requirement applicable when one Emergency Service Water (ESW) pump or loop is determined to be inoperable. This amendment request deletes the reference to Section 4.5.G.1 in Section 4.8.E.2 and replaces it with a requirement to verify OPERABILITY of the opposite train low pressure core and containment cooling systems and Emergency Diesel Generator (EDG). Because of that reference, the operability of the EDG in the opposite division must be demonstrated (by means of operation). That action is not appropriate when a division of ESW is determined to be inoperable. Section 4.5.G.1 is also revised to require a determination that the other EDG is not affected by a common cause within 24 hours. That determination may be made by either evaluation or test. The EDG conditional surveillance would still be required each 72 hours. This change is consistent with the guidance provided in NRC Generic Letter 93-05 and the Improved Standard TS, NUREG-1433.

This amendment request also revises the format and language of TS Section 5.5 in order to be more consistent with the Improved Standard TS. This revision clarifies the

requirements and states the capacity of fuel pool and vault storage. The initial submittal of RTS-285 included a new limit on enrichment of new fuel for storage in the New Fuel Storage Vault. This new limit would be redundant to the limits established in GE's Standard Application for Reactor Fuel (GESTAR) and has therefore been withdrawn. All new fuel to be stored either in the New Fuel Vault or the Spent Fuel Pool will be of an approved design.

This amendment request also revises the list of Operations Committee responsibilities (Section 6.5.1.6) to eliminate Committee review of procedures implementing Security and Emergency Plans and similarly revises the descriptions of procedures. These changes are consistent with the guidance of NRC Generic Letter 93-07.

Basis for proposed No Significant Hazards Consideration:

The Commission has provided standards (10 CFR Section 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.

After reviewing this proposed amendment, we have concluded:

- 1) The proposed revision does not involve a significant increase in the probability or consequences of an accident previously evaluated. The changes are administrative in nature and are consistent with previously-published NRC guidance. 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 for which the DAEC has previously been credited. The proposed revision to the Surveillance Requirements will continue to assure OPERABILITY as required, but eliminate unnecessary operation of an EDG and is consistent with the requirements of the Improved Standard TS, NUREG-1433.
- 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.
- 3) The proposed revision does not involve a significant reduction in a margin of safety. 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.

Based upon the above, we have determined that the proposed amendment will not involve a significant hazards consideration.

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