

PROPOSED CHANGE RTS-253 TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATION

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend Appendix A (Technical Specifications) to said license by deleting current page 3.1-2 and replacing it with the attached, new page.

Affected Page

3.1-2*

* This page is also affected by Amendment Request RTS-186.

SUMMARY OF CHANGES:

<u>Page</u>	<u>Description of Changes</u>
3.1-2	Incorporates an extended channel functional test interval in accordance with GL 91-09. Also extends the channel calibration interval from "Annually" to "at least once per OPERATING CYCLE" consistent with the intent of STS. The "SURVEILLANCE REQUIREMENT" header is revised to read "SURVEILLANCE REQUIREMENTS" to be consistent with other amendment requests.

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LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

B. Two RPS electric power monitoring modules (or Electric Protective Assemblies - EPA's) for each in-service RPS MG set or alternate source shall be OPERABLE or

1. With one RPS electric power monitoring module (or EPA) for an in-service RPS MG set or alternate power supply inoperable, restore the inoperable module (EPA) to OPERABLE status within 72 hours or remove the associated RPS MG set or alternate power supply from service.

2. With both RPS electric power monitoring modules (EPA's) for an in-service MG set or alternate power supply inoperable, restore at least one to OPERABLE status within 30 minutes or remove the associated RPS MG set or alternate power supply from service.

tested immediately before the trip system containing the failure is tripped. The trip system containing the unsafe failure may be placed in the untripped condition during the period in which surveillance testing is being performed on the other RPS channels. The trip system may be in the untripped position for no more than eight hours per functional trip period for this testing.

B. The RPS power monitoring system (EPA's) instrumentation shall be determined OPERABLE:

1. By performance of a CHANNEL FUNCTIONAL TEST each time the plant is in COLD SHUTDOWN for a period of more than 24 hours, unless performed within the previous 6 months.

2. At least once per OPERATING CYCLE by demonstrating the OPERABILITY of over-voltage, under-voltage and under-frequency protective instrumentation by performance of a CHANNEL CALIBRATION including simulated automatic actuation of the protective relays, tripping logic and output circuit breakers and verifying the following limits:

- a. Over voltage \leq 132 VAC
- b. Under voltage \geq 108 VAC
- c. Under frequency \geq 57 Hz

SAFETY ASSESSMENTIntroduction:

By letter dated December 11, 1992, Iowa Electric Light and Power Company (IELP) submitted a request for revision to Section 4.1.B of the Technical Specifications, Appendix A to Operating License No. DPR-49 for the Duane Arnold Energy Center. The proposed change would revise the Reactor Protection System (RPS) Electrical Protection Assembly (EPA) channel functional test requirements in accordance with NRC Generic Letter (GL) 91-09 "Modification of Surveillance Interval for the Electrical Protective Assemblies in Power Supplies for the Reactor Protection System." This will require that the test be performed each time the plant is in cold shutdown for more than 24 hours, unless the test was performed in the previous six months. In addition, the EPA channel calibration would be extended from 12 months to an operating cycle, which is defined in the DAEC TS as 18 months.

Evaluation:

Performance of the RPS EPA channel functional test and channel calibration requires that RPS bus power be transferred from the associated RPS motor-generator set to the alternate power supply. This transfer of power momentarily interrupts power to the RPS bus and causes a half scram and group isolations to occur. The time spent in these half-tripped conditions increases the potential for inadvertent scrams and other challenges to safety systems.

The proposed change to the EPA channel functional test interval is recommended by GL 91-09. The proposed interval requires testing when the unit is shutdown for more than 24 hours during an operating cycle unless the test had been performed in the previous six months. In the event that a cold shutdown condition is not encountered, the effect of the reduced testing of EPAs during the operating cycle is a small risk to safety. The NRC has concluded that the benefit to safety associated with reduced challenges to safety systems more than offsets the risk to safety from relaxing the surveillance intervals.

The proposed change to the EPA channel calibration is consistent with the intent of GL 91-09 in that EPA testing during power operation is eliminated. An interval of once every operating cycle is consistent with STS, since the DAEC TS defines an operating cycle as 18 months when applied to surveillance test frequencies. The effect of an extended interval on EPA setpoint drift has also been evaluated. This evaluation concluded that our current in-plant trip settings for EPAs provide adequate

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margin for the drift associated with the proposed interval. This interval has been fully incorporated into our setpoint methodology.

Based on the above evaluation, we conclude that the proposed Technical Specification changes are acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) identifies the licensing and regulatory actions eligible for categorical exclusion from performing 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. Iowa Electric Light and Power has reviewed this request and determined that the proposed amendment meets the 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 amendment. The basis for this determination follows:

Basis

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

1. As demonstrated in Attachment 1, the proposed amendment does not involve a significant hazards consideration.
2. The proposed change to the surveillance intervals for the Reactor Protection System (RPS) Electrical Protection Assemblies (EPAs) will have no effect on the types or amounts of effluents released offsite.
3. The proposed change to the surveillance intervals for the RPS EPAs will have no effect on individual or cumulative occupational radiation exposure.