Iowa Electric Light and Power Company

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

NG-92-5179
December 31, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op License No: DPR-49
Request for Technical Specification Change (RTS-249): Addition of Technical Specifications 3.0 and 4.0 and Bases
Reference: Letter, J. Franz to T. Murley; Request for Technical Specification Change (RTS-197); Dec. 4, 1992; NG-92-5326
File: A-117

Dear Dr. Murley:

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, Iowa Electric Light and Power Company (IELP) hereby requests revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

The proposed change adds Technical Specifications 3.0 and 4.0, corresponding Bases, and modifies existing specifications consistent with these new requirements denoting the applicability of Limiting Conditions for Operations and Surveillance Requirements. The proposed change is consistent with the requirements denoted in the Standard Technical Specifications and Generic Letters 87-09 and 89-14.

The 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, including the analysis which concludes that there are no significant hazards considerations, is being forwarded to our appointed state official.

We ask that your approval of this request be subsequent to your approval of our referenced RTS-197. Should you have any questions regarding this matter, please contact this office.

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

IOWA ELECTRIC LIGHT AND POWER COMPANY

By David L. Wilson for
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 31st day of December, 1992, by David L. Wilson.

Mary Michele O'Neal
Notary Public in and for the State of Iowa

MARY MICHELE O'NEAL
MY COMMISSION EXPIRES
6-8-95

6-8-95
Commission Expires

JFF/JMD/pjv

Attachments:
1) Evaluation of Change Pursuant to 10 CFR 50.92
2) Proposed Change RTS-249 to the Duane Arnold Energy Center Technical Specifications
3) Environmental Consideration
4) Safety Assessment

cc: M. Davis
L. Liu w/o attachments
L. Rootw/o attachments
R. McGaughy w/o attachments
R. Pulsifer (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
S. Brown (State of Iowa)
DCRC

EVALUATION OF CHANGE PURSUANT TO 10 CFR 50.92

Background

In 1991, an independent evaluation of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC) was completed. This evaluation was performed as part of the DAEC TS Improvement Program and included comparisons of the DAEC TS with TS from peer plants, the Standard Technical Specifications (STS) (NUREG-0123), and the draft Improved Technical Specifications (ITS) (NUREG-1433). The purpose of this proposed change is to (1) add Technical Specification Sections 3.0 and 4.0 and corresponding Bases and (2) modify existing specifications consistent with these new requirements denoting the applicability of Limiting Conditions for Operations and Surveillance Requirements.

The proposed Technical Specifications 3.0 and 4.0 and corresponding Bases were developed from Sections 3.0 and 4.0 of the STS as modified to the DAEC TS and plant specific nomenclature. Deviations to the STS or use of plant specific nomenclature are discussed herein. The addition of these requirements also reflect the changes denoted in Generic Letters 87-09 ("Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements" - June 4, 1987) and 89-14 ("Line-item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals" - August 21, 1989). Specifically, the incorporation of Generic Letters 87-09 and 89-14 modify the requirements denoted in the STS (NUREG-0123, General Electric - STS (BWR/5)) and are discussed herein. DAEC previously incorporated Generic Letter 89-14 changes as they applied to DAEC TS in Amendment No. 173 to our operating license. The incorporation of Generic Letter 89-14 in this submittal refers only to its effect on the new DAEC TS being added. Also discussed herein are various changes to existing specifications which must be modified as the result of the addition of the new requirements denoted in Specifications 3.0 and 4.0.

Iowa Electric Light and Power Company, Docket No. 50-331

Duane Arnold Energy Center, Linn County, Iowa

Date of Amendment Request: December 31, 1992

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 effluent 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 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. 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, the proposed amendment does not involve a significant hazards consideration.

2. The proposed change to incorporate the requirements of Standard Technical Specifications (STS) 3.0 and 4.0, corresponding STS 3.0 and 4.0 Bases, and to modify existing specifications consistent with the Specifications 3.0 and 4.0 have no effect on the types or amounts of effluent released offsite.

3. The proposed change to incorporate the requirements of Standard Technical Specifications (STS) 3.0 and 4.0, corresponding STS 3.0 and 4.0 Bases, and to modify existing specifications consistent with the Specifications 3.0 and 4.0 have no effect on individual or cumulative occupational radiation exposure.

SAFETY ASSESSMENT

Introduction

By letter dated December 31, 1992, Iowa Electric Light and Power Company (IELP) submitted a request for revision of the Technical Specifications, Appendix A to Operating License No. DPR-40, for the Duane Arnold Energy Center (DAEC). The proposed change would incorporate an Applicability section into DAEC Technical Specifications (DAEC TS) similar to that found in Standard Technical Specifications (STS) and Improved Technical Specifications (ITS).

Assessment

As part of the DAEC TS Improvement Program, an independent evaluation of the DAEC TS was performed. This included comparisons of the DAEC TS with Technical Specifications from peer plants, STS, and draft ITS.

IELP determined from the evaluation that the addition of an Applicability section, based upon STS 3.0/4.0, should be added to DAEC TS. This new section would be similar to those found in STS and ITS and would reflect current DAEC operating philosophy that is already enforced by plant procedures. The statements included in the Applicability section are administrative in nature and do not reflect any changes to physical plant equipment, operation or surveillance practices.

The deviations from STS wording in 3.0/4.0 are justifiable as they are either based upon later NRC guidance (e.g., GL 87-09, GL 89-14 or ITS), previously-approved changes on other dockets or are necessary for internal consistency with existing DAEC TS nomenclature and format.

The exceptions which are taken within individual DAEC TS to the provisions of various 3.0/4.0 Specifications are deemed to be acceptable as they are similar to exceptions taken in standard-format TS for plants similar to the DAEC.

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

Description of Amendment Request:

The proposed change adds Technical Specification Sections 3.0 and 4.0 and corresponding 3.0 and 4.0 Bases consistent with the requirements denoted in the STS and Generic Letters 87-09 and 89-14. The proposed change also modifies existing specifications consistent with the addition of these new requirements to the DAEC TS. The addition of Specifications 3.0.A, 3.0.B, 3.0.C, and 3.0.D establish the general requirements applicable to Limiting Conditions for Operation (LCO). The addition of Specifications 4.0.A, 4.0.B, 4.0.C, and 4.0.D establish the general requirements applicable to Surveillance Requirements.

Specification 3.0.A and Bases

The proposed Specification 3.0.A, consistent with the STS Specification 3.0.1, establishes the applicability within each individual specification as the requirement for when conformance to the LCO is required for safe operation of the facility. The action requirements establish those remedial measures that must be taken within specified time limits when the requirements of an LCO are not met.

The proposed Specification 3.0.A and Bases differs from that of STS Specification 3.0.1 and Bases by the following:

The reference to "Applicability statement" was revised due to the fact that the DAEC TS are of custom format and as such do not have a specific "Applicability" section for each individual LCO as typically denoted in the standard format Technical Specifications. For the DAEC TS, the applicability of each individual LCO is denoted within its individual specification.

The references to "OPERATIONAL CONDITIONS or other conditions" were modified to reflect that the DAEC TS are of custom format and as such do not use modes of operation to define LCO applicability as typically denoted in the standard format Technical Specifications. For the DAEC TS, the applicable condition is denoted within its individual specification.

These proposed changes do not change or modify the intent of the requirements denoted in the STS. These changes only clarify specific differences in the format that exist between the DAEC TS (custom format) and the STS (standard format).

Specification 3.0.B and Bases

The proposed Specification 3.0.B and Bases, consistent with the STS Specification 3.0.2 and Bases, establishes that noncompliance with a specification exists when the requirements of the LCO are not met and the associated action requirements have not been implemented within the specified time interval. The purpose of this specification is to clarify that (1) implementation of the action requirements within the specified time interval constitutes compliance with a specification and (2) completion of the remedial measures of the action requirements is not required when compliance with an LCO is restored within the time interval specified in the associated action requirements.

Specification 3.0.C and Bases

The proposed Specification 3.0.C and Bases, consistent with the STS Specification 3.0.3 and Bases, establishes the shutdown action requirements that must be implemented when an LCO is not met and the condition is not specifically addressed by the associated action requirements. The purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown condition when plant operation cannot be maintained within the limits for safe operation defined by the LCO and its action requirements.

The proposed Specification 3.0.C and Bases differs from that of STS Specification 3.0.3 and Bases by the following:

The STS phrase "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, ..." would be revised to "When an LCO is not met and the associated ACTIONS are not met or an associated ACTION is not provided, ..." This provides clarification that the conditions which must exist for the requirements of Specification 3.0.C to become applicable are when the associated ACTIONS are not met or when no associated ACTION is denoted. This proposed clarification is consistent with the clarifications provided in the Improved Technical Specifications.

The STS phrase "Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." would be revised to "Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by Specification 3.0.C is not required." This provides clarification and consistency with the revisions to Specification 3.0.C denoted above. The addition of "... LCO or ACTION..." provides clarification that an "associated ACTION" may not be denoted. This proposed clarification is consistent with the clarifications provided in the Improved Technical Specifications.

The STS phrase "Exceptions to these requirements are stated in the individual Specifications." would be revised to "Exceptions to this Specification are stated in the individual Specifications." This provides clarification that the exceptions were to the requirements denoted in Specification 3.0.C. This ensures the appropriate understanding of the use of Specification 3.0.C and clarifies what the statement "Specification 3.0.C is not applicable." means when stated in an ACTION. This proposed clarification is consistent with the clarifications provided in the Improved Technical Specifications.

The references to "OPERATIONAL CONDITIONS or other conditions" were modified to reflect that the DAEC TS are of custom format and as such do not use modes of operation to define LCO applicability as typically denoted in the standard format Technical Specifications. For the DAEC TS, the applicable condition is denoted within its individual specification.

The STS words "POWER OPERATION" would be revised to "REACTOR POWER OPERATION" for consistency with DAEC plant specific nomenclature.

These proposed changes do not change or modify the intent of the requirements denoted in the STS. These changes only (1) clarify specific differences in the format that exist between the DAEC TS (custom format) and the STS (standard format), (2) provide clarity in the specification consistent with the Improved Technical Specifications, or (3) provide consistency with DAEC plant specific nomenclature.

Specification 3.0.D and Bases

The proposed Specification 3.0.D is consistent with the requirements denoted in the STS Specification 3.0.4 and is modified, in part, by the more recent guidelines established in Generic Letter 87-09. The proposed Specification 3.0.D establishes limitations on a change in operational conditions when an LCO is not met. It precludes placing the facility in a higher condition of operation when the requirements for an LCO are not met and continued noncompliance to these conditions would result in a shutdown to comply with the action requirements if a change in conditions were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher conditions of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits.

The modification of the STS Specification 3.0.4, consistent with Generic Letter 87-09, ensures consistency with operational requirements for plant systems. The STS Specification 3.0.4 currently denotes this inconsistency by prohibiting plant startup with inoperable equipment though continued power operation would be permitted with the same equipment in an inoperable condition. The NRC staff concluded in Generic Letter 87-09 that STS Specification 3.0.4 unduly restricted facility operation when conformance to the Action Requirements provided an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those Action Requirements. The restriction on a change in operational modes or other specified conditions should apply only where the Action Requirements establish a specified interval in which the LCO must be met or a shutdown of the facility would be required. The NRC staff concluded that as a consequence of the modifications by Generic Letter 87-09 to Specification 3.0.4, exceptions may be made for individual specifications if a mode change would be precluded by Specification 3.0.4. Specifically, some specifications do not satisfy the provisions under which mode changes are permitted by Specification 3.0.4. The NRC staff position was that the modifications by Generic Letter 87-09 to Specification 3.0.4 should not result in more restrictive requirements for individual specifications.

The proposed Specification 3.0.D and Bases differs from that of the modified STS Specification 3.0.4 and Bases by the following:

The STS phrase "Entry into an OPERATIONAL CONDITION or other specified condition shall not be made when the conditions for the Limiting Conditions for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time." would be revised to "When an LCO is not met, entry into a specified condition shall not be made except when the associated ACTIONS to be entered permit continued operation in the specified condition for an unlimited period of time." This provides clarification and is consistent with Generic Letter 87-09 guidance. This change also provides consistency for use of proposed Specification 3.0.D, since it is the permitting of continued operation for an unlimited period of time, not the requirement to shutdown, that determines the applicability of proposed Specification 3.0.D. This proposed clarification is also consistent with the clarifications provided in the Improved Technical Specifications.

The references to "OPERATIONAL CONDITIONS or other conditions" were modified to reflect that the DAEC TS are of custom format and as such do not use modes of operation to define LCO applicability as typically denoted in the standard format Technical Specifications. For the DAEC TS, the applicable condition is denoted within its individual specification.

The STS phrase "Exceptions to these requirements are stated in the individual Specifications." would be revised to "Exceptions to this Specification are stated in the individual Specifications." This provides clarification that the exceptions were to the requirements denoted in Specification 3.0.D. This ensures the appropriate understanding of the use of Specification 3.0.D and clarifies what the statement "Specification 3.0.D is not applicable." means when stated in an ACTION. This proposed clarification is consistent with the clarifications provided in the Improved Technical Specifications.

These proposed changes do not change or modify the intent of the requirements denoted in the STS. These changes only (1) clarify specific differences in the format that exist between the DAEC TS (custom format) and the STS (standard format), or (2) provide clarity in the specification consistent with Generic Letter 87-09 and the Improved Technical Specifications.

Specification 4.0.A and Bases

The proposed Specification 4.0.A, consistent with the STS Specification 4.0.1, establishes the requirement that surveillances must be performed during the operational conditions for which the requirements of the LCO apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a specified condition for which the associated LCO are applicable.

The proposed Specification 4.0.A and Bases differs from that of STS Specification 4.0.1 and Bases by the following:

The references to "OPERATIONAL CONDITIONS or other conditions" were modified to reflect that the DAEC TS are of custom format and as such do not use modes of operation to define LCO applicability as typically denoted in the standard format Technical Specifications. For the DAEC TS, the applicable condition is denoted within its individual specification.

The STS phrase "... in an individual Surveillance Requirement" was deleted for clarity. The custom format that exists in the DAEC TS could allow for conditional surveillances to be described in the specific LCO. Therefore, the proposed clarification "...unless otherwise stated." would apply to both Surveillance Requirements and LCO's.

These proposed changes do not change or modify the intent of the requirements denoted in the STS. These changes only clarify specific differences in the format that exist between the DAEC TS (custom format) and the STS (standard format).

Specification 4.0.B and Bases

The proposed Specification 4.0.B is consistent with the requirements denoted in the STS 4.0.2 and is modified by the more recent guidelines established in Generic Letter 89-14. The proposed Specification 4.0.B establishes the limit for which the specified time interval for Surveillance Requirements may be extended. The purpose of this specification is to permit an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable tor conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities.

The modification of the STS Specification 4.0.2, consistent with Generic Letter 89-14, reflects the removal of the 3.25 limit on extending surveillance intervals. The intent of the 3.25 limit was to preclude routine use of the provision for extending a surveillance interval by 25 percent. The NRC staff concluded in Generic Letter 89-14 that the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis. The NRC staff also concluded that the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. The incorporation of Generic Letter 89-14 will, therefore, remove an unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety.

Specification 4.0.C and Bases

The proposed Specification 4.0.C is consistent with the requirements denoted in the STS Specification 4.0.3 and is modified by the more recent guidelines established in Generic Letter 87-09. The proposed Specification 4.0.C establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.B, as a condition that constitutes a failure to meet the OPERABILITY requirements for an LCO.

The modification of the STS Specification 4.0.3, consistent with Generic Letter 87-09, ensures the flexibility to perform a missed surveillance in a reasonable period of time. The STS Specification 4.0.3 currently denotes that failure to perform a surveillance requirement results in the failure to demonstrate that a structure, system, or component is operable and, therefore, would require a plant shutdown. If an immediate attempt to perform the missed surveillance were made in order to prevent the plant shutdown, the quality of plant control could be degraded. The incorporation of Generic Letter 87-09 permits up to a 24-hour delay in implementing Action Statement requirements for the completion of the missed Surveillance Requirement. The NRC staff concluded in Generic Letter 87-09 that it was overly conservative to assume that systems or components were inoperable when a Surveillance Requirement had not been performed. The NRC staff position was that the opposite was in fact the case; in that the vast majority of surveillances demonstrate that systems or components are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. The NRC staff also

concluded that because the allowable outage time limits of some Action Requirements did not provide an appropriate time limit for performing a missed surveillance before shutdown requirements were invoked, a 24-hour time limit would allow a delay of the required actions to permit the performance of the missed surveillance. The 24-hour time limit was based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completion of the surveillance. The NRC staff concluded that the 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

The proposed Specification 4.0.C Bases differs from that of STS Specification 4.0.3 Bases by the following:

> The proposed Specification 4.0.C Bases is additionally modified to clarify what constitutes a reportable event for missed surveillances. The proposed clarifications denote that "any reports required by 10 CFR 50.73 shall be determined based upon the length of time the surveillance interval has been exceeded, and the corresponding LCO ACTION time requirements." This is consistent with the current IELP practice for reportability determinations and is consistent with specifications recently approved by the NRC on the Limerick Generating Station, Units 1 and 2 docket.

This proposed change does not change or modify the intent of the requirements denoted in the STS.

Specification 4.0.D and Bases

The proposed Specification 4.0.D is consistent with the requirements denoted in the STS 4.0.4 and is modified by the more recent guidelines established in Generic Letter 87-09. The proposed Specification 4.0.D establishes the requirement that all applicable surveillances must be met before entry into an operational condition or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component operability requirements or parameter limits are met before entry into an operational condition or other specified condition for which these systems and components ensure safe operation of the facility.

The modification of the STS 4.0.4, consistent with Generic Letter 87-09, ensures that Specification 4.0.4 does not conflict with Specification 4.0.3 to prevent passage through or to operational conditions as required to comply with Action Statement requirements. Conversely, the change ensures that Specification 4.0.3 could not prevent entry into a mode for which a surveillance is required to demonstrate operability when that surveillance can only be performed in that particular mode. The NRC staff concluded in Generic Letter 87-09 that the potential for a plant upset and challenge to safety systems is heightened if surveillances are performed during a shutdown to comply with Action Requirements and, therefore, it is not the intent of Specification 4.0.4 to prevent passage through or to operational conditions as required to comply with Action Requirements and should not apply when mode changes are imposed by Action Requirements.

The proposed Specification 4.0.D and Bases differs from that of STS 4.0.4 and Bases by the following:

The STS phrase "... the applicable surveillance interval ..." will be revised to "... the allowed surveillance interval, defined by Specification 4.0.B, ..." The reference to Specification 4.0.B was added for clarification. The phrase is also consistent with the statement in Specification 4.0.C.

The references to "OPERATIONAL CONDITIONS or other conditions" were modified to reflect that the DAEC TS are of custom format and as such do not use modes of operation to define LCO applicability as typically denoted in the standard format Technical Specifications. For the DAEC TS, the applicable condition is denoted within its individual specification.

The proposed Specification 4.0.D Bases is additionally modified to be consistent with DAEC TS format. The STS words "...in the Applicability statement." would be deleted because the DAEC TS are currently not structured in the STS format containing specific "Applicability statements."

These proposed changes do not change or modify the intent of the requirements denoted in the STS. These changes only clarify specific differences in the format that exist between the DAEC TS (custom format) and the STS (standard format).

Definition - "Action"

The proposed definition ACTION is being added and is consistent with that of the STS definition 1.1.

Definition - "Surveillance Frequency"

The definition SURVEILLANCE FREQUENCY is being deleted. The definition is redundant with the new proposed Specification 4.0.B.

Definition - "Frequency Notation"

The proposed definition FREQUENCY NOTATION is being enhanced consistent with that of STS definition 1.16. The proposed change also adds specific surveillance interval frequencies for inservice inspection and testing of ASME Code Class 1, 2, and 3 components. These requirements are consistent with the requirements contained in STS Specification 4.0.5.

Non-Applicabilities to Specification 3.0.C

Specifications 3.10.B.1, 3.14.A, and 3.14.B require an exception to the provisions of Specification 3.0.C. These specifications denote an applicability "at all times" and maintain Action Requirements consisting of remedial measures to be taken. The proposed changes to these specifications are consistent with exceptions to Specification 3.0.3 denoted in the STS.

Non-Applicabilities to Specification 3.0.D

Table 3.1-1, Note 1; Table 3.2-A, Note 2; Table 3.2-B, Note 1; 3.2.D.1; Table 3.2-D; Table 3.2-F, Note 1; 3.3.A.2; and 3.7.D.2 require an exception to the provisions of Specification 3.0.D. These exceptions are being added to clarify that a mode change would not be precluded by Specification 3.0.D. These specifications do not satisfy the provisions under which mode changes are permitted by Specification 3.0.D as discussed above in "Specification 3.0.D and Bases." The proposed changes to these specifications are consistent with exceptions to Specification 3.0.4 denoted in the STS.

Non-Applicabilities to Specification 4.0.B

Table 4.6.H-1 and Specifications 4.7.A.2.d.1); 4.7.A.2.d.2)a); 4.7.A.2.d.2)b); 4.7.A.2.d.3); and 4.7.A.2.e require an exception to the provisions of Specification 4.0.B. These specifications require surveillance testing either (1) at intervals which have extension allowances denoted within the specification or (2) at intervals which are mandated by the Code of Federal Regulations that specify no extension allowances. The proposed changes to these specifications are consistent with exceptions to Specification 4.0.2 denoted in the STS.

Non-Applicabilities to Specification 4.0.D

TS Table 4.1-1 and Specifications 4.5.D; 4.5.E; 4.6.D.3; 4.12.A; 4.12.B; and 4.12.C require an exception to the provisions of Specification 4.0.D. These specifications require associated surveillance testing which can only be performed after entry into the applicable mode. The proposed changes to these specifications are consistent with exceptions to Specification 4.0.4 denoted in the STS. For Specifications 4.5.D; 4.5.E; and 4.6.D.3; a limit of 12 hours is provided to ensure that these surveillances are performed within a reasonable time-frame once the mode is entered. A conditional action statement is provided to clarify that if OPERABILITY is not successfully demonstrated within the 12-hour period, action would be taken to reduce the reactor steam dome pressure to less than the pressure specified for the applicable condition (150 psig for Specification 4.5.D and 4.5.E; 100 psig for Specification 4.6.D.3) within the following 72 hours. The time limit of 72 hours provides a sufficient amount of time for remedial measures to be taken prior to placing the plant in the non-applicable mode. This conditional action statement is consistent with specifications recently approved by the NRC on the Limerick Generating Station, Units 1 and 2 docket. The addition of this conditional action statement to the 4.0.D exceptions only clarifies actions which would otherwise have to be interpreted by the operators. A limit of 12 hours for completing surveillances is also given for certain trip functions listed in Table 4.1-1. This assures required surveillances will be completed in an appropriate time frame in cases where actions are not being taken to immediately proceed to a shutdown condition.

Specification 4.6.G and Bases

Specification 4.6.G and Bases has been revised to incorporate STS Specification 4.0.5 and Bases which establishes the inservice inspection and inservice testing requirements. This specification, as proposed, establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. This specification also clarifies the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This ensures consistency in surveillance intervals throughout the Technical Specifications and removes any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities. The proposed changes are consistent with the requirements contained in STS Specification 4.0.5.

The proposed changes to Specification 4.6.G and to Specification 1.0

(Frequency Notation) are in lieu of a new specification in the 3.0/4.0 section of the DAEC TS similar to STS Specification 4.0.5. Due to the fact that the DAEC TS already established inservice inspection and inservice testing requirements in Specification 4.6.G prior to this submittal, relocating these requirements to a new specification (3.0/4.0) would require extensive surveillance procedure changes. While these surveillance procedure changes would be administrative in nature, they would be required to ensure a consistent referencing between the surveillance procedures and the corresponding DAEC TS. Consequently, we have chosen to leave these requirements in Specification 4.6.G.

Basis for Proposed No Significant Hazards Consideration

The Commission has provided standards (10 CFR 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.

In reviewing the proposed request for Technical Specification change, we have concluded:

(1) The proposed change will not increase the probability or consequences of an accident previously evaluated. The change provides specific applicability requirements to both the Limiting Conditions for Operation and the Surveillance Requirements. The proposed change incorporates only those applicability requirements and exceptions denoted in the Standard Technical Specifications as modified by Generic Letters 87-09 and 89-14, the Improved Technical Specifications (NUREG-1433), or DAEC plant specific terminology which is considered administrative in nature. Invoking the proposed applicability requirements, and thus the administrative requirements imposed on the systems, subsystems, trains, components, or devices, better ensures that these systems, subsystems, trains, components, or devices will be available to mitigate the consequences of an accident or transient event. Further, the proposed change does not affect any accident or safety analysis event initiator as analyzed in the Final Safety Analysis Report, nor involve any modification to equipment.

(2) The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not affect any equipment design or configuration and, therefore, no new or different types

of failures are created. The proposed change will not create any new modes of operation, but ensures that appropriate administrative requirements are invoked (i.e. operability status of a system) prior to mode changes.

(3) The proposed change will not involve a significant reduction in a margin of safety. The proposed change does not reduce the margin of safety because it has no impact on any safety analysis assumption. The proposed change is in fact more restrictive due to the additional administrative requirements imposed on the Limiting Conditions for Operation and Surveillance Requirements in each individual specification. The proposed change ensures that each system, subsystem, train, component, or device denoted in the Technical Specifications is maintained with applicability requirements that are consistent with the Standard Technical Specifications and other regulatory guidance documents.

Therefore, the proposed license amendment is judged to involve no significant hazards consideration.

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PROPOSED CHANGE RTS-249 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 deleting certain pages and replacing them with the attached, new pages. The List of Affected Pages is given below.

List of Affected Pages

i	3.2-45a+
ii*	3.3-3
1.0-1	3.5-7
1.0-7	3.5-8
1.0-8	3.5-18
3.0-1	3.6-9*
3.0-2	3.6-11*
3.0-3	3.6-12*
3.0-4	3.6-13*
3.0-5	3.6-24*
3.0-6	3.6-29*
3.1-5+	3.7-6#
3.1-8+	3.7-7#
3.1-11+	3.7-19#
3.1-15+	3.10-2a
3.2-3+#	3.12-1
3.2-6+	3.12-2
3.2-15+	3.12-3
3.2-19+	3.14-1
3.2-22+	3.14-2
3.2-45+	

Summary of Changes:

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

Page	Description of Change
i and ii	The Table of Contents has been revised to reflect that Section 3.0, "Applicability," has been added. The corresponding Surveillance Requirements and page number have also been added.

\+ These pages are common to RTS-186
* These pages reflect changes made by RTS-197
\# These pages are common to RTS-246

Page	Description of Change
1.0-1	Definition 4, "ACTION" has been added consistent with that of the STS definition 1.1.
1.0-7	Definition 26, "SURVEILLANCE FREQUENCY" has been deleted. The definition is redundant with new Specification 4.0.B.
1.0-8	Definition 27, "FREQUENCY NOTATION" has been revised consistent with that of the STS definition 1.16 and has incorporated specific surveillance interval frequencies for inservice inspection and testing of ASME Code Class 1, 2, and 3 components. These requirements are consistent with the requirements contained in STS Specification 4.0.5.
3.0-1 to 3.0-6	Added STS 3.0 and 4.0, "Applicability," and corresponding Bases to the DAEC TS. The addition of Specifications 3.0.A, 3.0.B, 3.0.C, and 3.0.D establish the general requirements applicable to Limiting Conditions for Operation. The addition of Specifications 4.0.A, 4.0.B, 4.0.C, and 4.0.D establish the general requirements applicable to Surveillance Requirements.
3.1-5	Added a provision for the exception to Specification 3.0.D to Table 3.1-1, Note 1.
3.1-8 and 3.1-11	Added exception to Specification 4.0.D to Table 4.1-1, via Note 6, provided surveillances are completed within 12 hours or actions are taken to proceed to shutdown.
3.1-15	Added clarifying statement to TS 3.1 Bases concerning exception to Specification 3.0.D. Corrected typographical error on "inadvertent."
3.2-3	Added a provision for the exception to Specification 3.0.D to TS 3.2.D.1. Made editorial change to column headers for consistency.
3.2-6	Added a provision for the exception to Specification 3.0.D to Table 3.2.A, Note 2.
3.2-15	Added a provision for the exception to Specification 3.0.D to Table 3.2-B, Note 1.
3.2-19	Added a provision for the exception to Specification 3.0.D to Table 3.2-D.
3.2-22	Added a provision for the exception to Specification 3.0.D to Table 3.2-F, Note 1.

Page	Description of Change
3.2-45 and 3.2-45a	Added clarifying statement to TS 3.2 Bases concerning exception to Specification 3.0.D.
3.3-3	Added a provision for the exception to Specification 3.0.D to TS 3.3.A.2. Made editorial change to column header for consistency.
3.5-7	Added a provision for the exception to Specification 4.0.D to TS 4.5.D. Made editorial change to column header for consistency.
3.5-8	Added a provision for the exception to Specification 4.0.D to TS 4.5.E. Made editorial change to column header for consistency.
3.5-18	Added a statement to TS 3.5 Bases clarifying the 12 hour and 72 hour time periods for demonstration of HPCI and RCIC operability.
3.6-9	Added a provision for the exception to Specification 4.0.D to TS 4.6.D.3.
3.6-11 to 3.6-12	TS 4.6.G has been revised to incorporate the inservice inspection and inservice testing requirements denoted in STS Specification 4.0.5. Paragraph 4.6.G.2 has been renumbered 4.6.G.5 and moved from page 3.6-11 to 3.6-12.
3.6-13	Added Note f to Table 4.6.H-1 to clarify applicability of Specification 4.0.B.
3.6-24	Added a statement to TS 3.6 Bases clarifying the 12 hour and 72 hour time periods for demonstration of relief valve operability.
3.6-29	TS 4.6.G Bases has been revised to incorporate the inservice inspection and inservice testing requirements denoted in STS Specification 4.0.5.
3.7-6	Added a provision for the exception to Specification 4.0.B to TS 4.7.A.2.d.1), 4.7.A.2.d.2)a), and 4.7.A.2.d.2)b).
3.7-7	Added a provision for the exception to Specification 4.0.B to TS 4.7.A.2.d.3) and 4.7.A.2.e.

Page	Description of Change
3.7-19	Added a provision for the exception to Specification 3.0.D to TS 3.7.D.2. Made editorial change to column header for consistency.
3.10-2a	Added a provision for the exception to Specification 3.0.C to TS 3.10.B.1. Made editorial change to column header for consistency.
3.12-1	Added a provision for the exception to Specification 4.0.D to TS 4.12.A. Made editorial change to column header for consistency.
3.12-2	Added a provision for the exception to Specification 4.0.D to TS 4.12.B. Made editorial change to column header for consistency.
3.12-3	Added a provision for the exception to Specification 4.0.D to TS 4.12.C. Made editorial change to column header for consistency.
3.14-1	Added a provision for the exception to Specification 3.0.C to TS 3.14.A.
3.14-2	Added a provision for the exception to Specification 3.0.C to TS 3.14.B.