

PROPOSED CHANGE RTS-292 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 current pages and replacing them with the attached, new pages. The List of Affected Pages is given below.

LIST OF AFFECTED PAGES

1.0 - 1

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> |
|-------------|---|
| 1.0 - 1 | Add a paragraph to the Definition of Limiting Conditions for Operation (LCO) that provides the criteria for not entering the actions of an LCO when a system, component, etc. is removed from service in support of secondary modes of operation, such as surveillance testing. |

1.0 DEFINITIONS

The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the specifications may be achieved.

1. SAFETY LIMIT

The safety limits are limits below which the reasonable maintenance of the cladding and primary systems are assured. Exceeding such a limit requires unit shutdown and review by the Nuclear Regulatory Commission before resumption of unit operation. Operation beyond such a limit may not in itself result in serious consequences but it indicates an operational deficiency subject to regulatory review.

2. LIMITING SAFETY SYSTEM SETTING (LSSS)

The limiting safety system settings are settings on instrumentation which initiate the automatic protective action at a level such that the safety limits will not be exceeded. These settings take into consideration the instrumentation tolerances and the instruments are required to be periodically calibrated as specified in these Technical Specifications. The limiting safety system setting plus the tolerance of the instrument as given in the system design control document gives the limiting trip point for operation. This additional margin has been established so that with proper operation of the instrumentation the safety limits will never be exceeded. The inequality sign which may be given merely signifies the preferred direction of operational trip setting.

3. LIMITING CONDITIONS FOR OPERATION (LCO)

The limiting conditions specify the minimum acceptable levels of system performance necessary to assure safe startup and operation of the facility. When these conditions are met, the plant can be operated safely and abnormal situations can be safely controlled.

When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and devices(s) are OPERABLE, or likewise satisfy the requirements of this specification.

[Insert (A) here.]

4. DELETED

INSERT TO TS PAGES FOR RTS-292

[Insert A]

When a system, subsystem, train, component, or device is removed from service (or otherwise made inoperable) during secondary modes of operation (i.e., conditions or states other than the primary safety function, such as surveillance testing. Note: maintenance activities are not secondary modes of operation.), it may be considered OPERABLE for the purposes of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) such secondary modes of operation are controlled by plant procedures; (2) is administratively limited in duration (or is controlled by an Allowed Outage Time note within these Technical Specifications); and, (3) all of its redundant systems, subsystems, trains, components, or devices are OPERABLE or likewise satisfy the requirements of this specification.

SAFETY ASSESSMENT

By letter dated May 9, 1997, IES Utilities Inc. submitted a request for revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed TS amendment would revise the definition of Limiting Conditions for Operation (LCO) to address the situation when systems, components, etc. are removed from service or otherwise made inoperable during secondary modes of operation, without requiring entry into the LCO actions. This is the current operating practice at the DAEC and is supported by the plant design and licensing basis. Within the definition of LCO, such secondary modes are also being defined consistent with the DAEC design and licensing basis. As compensatory measures during such secondary modes of operation, criteria are established within the definition of LCO that ensure the plant is operated consistent with the original design basis assumptions. The criteria establish the administrative controls that ensure that the plant is under the control of the operators, *i.e.*, use pre-approved plant procedures, limit the amount of time in such secondary modes, and ensure that a loss-of-function is not inadvertently created. (Note: for some systems, surveillance testing will create a loss-of-function. Consequently, the criteria are applied to both systems, trains, etc., in this situation.) If these criteria are not met, then the LCO will be entered and those actions will be taken in the specified time period.

In addition to the most-recent meeting on March 20, 1997, this DAEC practice has been the subject of previous communications with the Staff (Ref. September 22, 1994 Meeting and IES letters NG-94-4017, dated November 30, 1994 and NG-95-0815, dated March 10, 1995) on the Generic Letter 89-10 Program for motor-operated valves.

Assessment:

The fundamental design and licensing basis for the DAEC is that LCO actions are only intended to be entered when equipment is removed from service for maintenance (either corrective or preventative), not when taken out of service for testing or other allowed secondary modes of operation (Ref. General Electric reports APED-5736: Guideline for Determining Safe Test Intervals and Repair Times for Engineered Safeguards, and NEDO-10739: Methods for Calculating Safe Test Intervals and Allowable Repair Times for Engineered Safeguard Systems). This was determined to be acceptable because the time in such secondary modes of operation (*i.e.*, the safe test interval) is very short in duration, especially when compared to the allowable repair time for maintenance (*i.e.*, LCO time); and, that redundant systems, trains, etc. would not be removed from service simultaneously. Operation in secondary modes of operation (such as, system/component testing, torus cooling mode (test line-up) of Residual Heat Removal system, and use of High Pressure Coolant Injection system or Reactor Core Isolation Cooling system in test line-up for reactor pressure control during transients) is assumed in the safety analysis report (Ref. UFSAR Section 6.3.4.2.1 and 7.3.4.2). Because maintenance activities are not considered to be secondary modes of operation in the above evaluations, they are purposefully excluded from this TS definition.

The proposed change merely adds criteria to the TS that are consistent with the assumptions contained within these evaluations; no actual changes in the way plant equipment is operated or tested is being proposed. The uniform application of the new TS criteria will further ensure that the plant remains within the original design and licensing basis assumptions for equipment removed from service during secondary modes of operation. In particular, in the special case where testing also removes the redundant system, train, component, etc., from service, these criteria ensure that both affected systems, trains, etc., are properly controlled. This is acceptable because the time in such secondary modes of operation is very short in duration, such that the impact on overall availability/reliability is insignificant.

Consequently, based upon the above evaluation, we find that the proposed changes in the TS definition for LCO to not require entry into the LCO actions for secondary modes of operation, provided the associated criteria are met, to be acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR Part 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 Part 51.22(c)(9). Pursuant to 10 CFR Part 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 Part 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 revises the definition of Limiting Conditions for Operation (LCO) to address the situation when systems, components, etc. are removed from service or otherwise made inoperable during secondary modes of operation, without requiring entry into the LCO actions. This is the current operating practice at the DAEC and is supported by the plant design and licensing basis. The proposed change merely adds criteria to the TS that are consistent with the assumptions contained within the design basis; no actual changes in the way plant equipment is operated or tested are being proposed. Consequently, there will be no increase in either the types or amounts of effluents that may be released offsite as a result of this proposed change.
3. The proposed Amendment revises the definition of Limiting Conditions for Operation (LCO) to address the situation when systems, components, etc. are removed from service or otherwise made inoperable during secondary modes of operation, without requiring entry into the LCO actions. This is the current operating practice at the DAEC and is supported by the plant design and licensing basis. The proposed change merely adds criteria to the TS that are consistent with the assumptions contained within the design basis; no actual changes in the way plant equipment is operated or tested are being proposed. Consequently, there will be no increase in either individual or cumulative occupational exposure as a result of this proposed change.