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June 10, 1997  
NG-97-1010

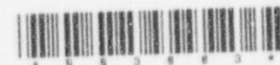
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Response to Request for Additional Information on Improved Technical  
Specification Change for Instrument Setpoints

- Reference:
- 1) G. Kelly (NRC) to L. Liu (IES), "Duane Arnold Energy Center - Request for Additional Information on Duane Arnold Energy Center Conversion of the DAEC Technical Specifications to the Improved Technical Specifications Regarding Setpoint Allowed Values (TAC No. M97197)"
  - 2) J. Franz (IES) to F. Miraglia (NRC), "Submittal of License Amendment Request to Convert the DAEC Technical Specifications to the Improved Technical Specifications (NUREG-1433), (RTS-291)," NG-96-2322, dated October 30, 1996.
  - 3) J. Franz (IES) to A. B. Beach (NRC), "IES Commitments Regarding Compliance with Technical Specification Instrument Settings," NG-97-0395, dated February 25, 1997
  - 4) G. Kelly (NRC) to IES Utilities Inc., "Summary of March 20, 1997 Meeting on Technical Specification Setpoints and the Practice of Not Entering Limiting Conditions for Operation (LCO) Action Statements During Certain Surveillances," April 3, 1997.

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Dear Sir(s):

Reference 1 requested additional information regarding our submittal (Ref. 2) to convert the DAEC current Technical Specifications (CTS) to the Improved Technical Specifications (ITS). Specifically, the Reference 1 letter requested additional supporting justification for the conversion of the specific nominal trip setpoints (NTSP) in the CTS to the Allowable Values (AV) in the ITS for instrument setpoints. The Enclosure to this letter provides this requested information. The Enclosure is organized as follows:

Section I provides a brief overview of the DAEC Instrument Setpoint Control Program, which has been more fully discussed with the Staff in recent meetings and correspondence (Refs. 3 and 4). In particular, Section I describes how setpoints are established when an Analytical Limit (AL) exists, as well as when no AL exists and the setpoints are established using other information. It also contains a glossary of terms and acronyms used in the document and a diagram depicting the relationships between the various elements used in the determination of instrument setpoints. Section II contains the Index and Legend that explains the format and content of the individual Datasheets for the ITS line items provided in Section III.

As discussed previously (Refs. 3 and 4), the DAEC Instrument Setpoint Control Program is based upon the General Electric Instrument Setpoint Methodology (NEDC-31336P), which conforms to the guidelines of Regulatory Guide 1.105, Rev. 2 and ISA Standard S.67.04, 1982.

In addition, for those instruments whose calibration frequencies are being extended in the ITS, the AVs in the ITS were developed in accordance with the guidance contained in Generic Letter 91-04, as discussed more fully in the Discussion of Change (DOC) in Volume 9 of Reference 2 (e.g.,  $L_{CY}$  and  $L_{IC}$ ).

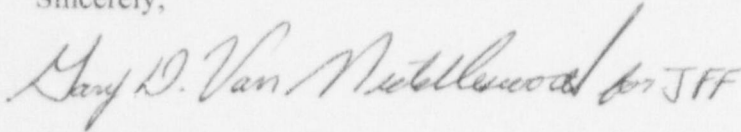
Because the Enclosure represents a condensation of a significant amount of detailed information, we recognize that further dialogue may be needed on specific issues. If the Staff needs to review this detailed information, further discussions may be more efficiently conducted at the DAEC, where the necessary background information and setpoint calculation packages are located.

The information contained in the Enclosure represents current plant design information. Because reconstruction of the DAEC design basis is a "living" process, this information will change in the future. Consequently, we do not consider this submittal to constitute any commitments on our part to keep the Staff informed of any such changes other than those required by 10 CFR Parts 50.59 and 50.90.

No commitments are being made or revised by this letter.

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

Sincerely,



John F. Franz  
Vice President, Nuclear

Enclosure: Duane Arnold Energy Center, Current-to-Improved Technical Specifications Setpoint Cross-Reference Document

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cc: R. Browning  
L. Root  
G. Kelly (NRC-NRR)  
A. B. Beach (Region III)  
NRC Resident Office  
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