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May 10, 1999
NG-99-0276

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Station 0-P1-17
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Technical Specification Change Request (TSCR-011): "Control Building
Envelope Allowed Outage Time"

File: A-117

Dear Sir(s):

In accordance with the Code of Federal Regulations, Title 10, Sections 50.59 and 50.90, IES Utilities Inc. hereby requests revision to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

A change to the Standard Technical Specification (NUREG-1433, Improved Standard Technical Specifications for General Electric BWR/4 Plants) is in the TSTF (Technical Specifications Task Force) review process as Generic Traveler # TSTF-287, Revision 2 (Ventilation System Envelope Allowed Outage Time). This proposed revision to the DAEC TS is consistent with this traveler.

At the DAEC, the control room is located in the control building. The ventilation system that provides control room air flow also supplies the remainder of the control building. Because the source of control room air is common with the air distributed to the remainder of the control building, no special means of isolating the control room from the rest of the control building is provided.

This change revises Technical Specification Section 3.7.4 by providing specific Conditions and Required Actions for the control building barrier degradation (as opposed to ventilation train degradation). The Surveillances that test the integrity of the control room barrier require a positive pressure limit to be satisfied for the control room with one required ventilation train operating. While other Surveillances in the same specification

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test the operability of the ventilation train, these barrier Surveillances ensure the control building envelope leak tightness is adequate to meet the design assumptions. However, there are no corresponding Conditions, Required Actions, or Completion Times associated with failure of these barrier Surveillances. Under existing specifications, LCO (Limiting Conditions for Operation) 3.0.3 must be entered (for two train inoperability). The proposed change would allow 24 hours (during operating MODES) to restore the capability to maintain proper control room pressure before requiring the unit to perform an orderly shutdown. Requiring the plant to enter LCO 3.0.3 when the control building envelope is not intact is excessively restrictive. The proposed change is acceptable because of the low probability of a Design Basis Accident (DBA) occurring during the 24 hour Completion Time, and the availability of the Standby Filter Unit (SFU) system to provide a filtered environment (albeit with potential control building in-leakage).

This change also adds an LCO Note to allow intermittent opening of the control building barrier (e.g. as for entering and exiting) under administrative control, without entering Actions. (This is modeled after the Containment Isolation Valve (CIV) allowance to intermittently open penetrations that are otherwise required to be closed.) This change allows for intermittent opening of doors or other readily closable control building boundaries. For entry and exit through doors the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control building isolation is indicated.

These changes provide for consistency within the Technical Specifications and allow for repairs during plant operation. Basis changes have been included in this submittal for information only.

This application has been reviewed by the DAEC Operations Committee and the Safety Committee. A copy of this submittal, along with the evaluation of "No Significant Hazards Consideration", is being forwarded to our appointed state official pursuant to 10 CFR Section 50.91. Approval of this application is requested by December 15, 1999. To allow sufficient time for implementation, we request the effective date of this amendment be at least 60 days after the date of approval.

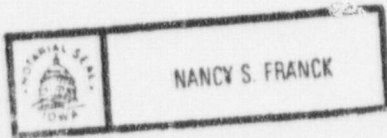
This letter is true and accurate to the best of my knowledge and belief.

IES UTILITIES INC.

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 10th day of May, 1999,
by David L. Wilson.



Nancy S. Franck
Notary Public in and for the State of Iowa

9-28-01
Commission Expires

- Attachments: 1) EVALUATION OF CHANGE PURSUANT TO 10 CFR
SECTION 50.92
2) PROPOSED CHANGE TSCR-011 TO THE DUANE ARNOLD
ENERGY CENTER TECHNICAL SPECIFICATIONS
3) SAFETY ASSESSMENT
4) ENVIRONMENTAL CONSIDERATION

cc: D. Barta
E. Protsch (w/o)
D. Wilson (w/o)
P. Mozafari (NRC-NRR)
J. Dyer (Region III)
P. Baig (State of Iowa)
NRC Resident Office
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EVALUATION OF CHANGE PURSUANT TO 10 CFR SECTION 50.92Background:

A change to the Standard Technical Specification (NUREG-1433, Improved Standard Technical Specifications for General Electric BWR/4 Plants) is in the TSTF review process as Generic Traveler # TSTF-287, Revision 2. This proposed revision to the DAEC TS is consistent with this traveler.

At the DAEC, the control room is located in the control building. The ventilation system that provides control room air flow also supplies the remainder of the control building. Because the source of control room air is common with the air distributed to the remainder of the control building, no special means of isolating the control room from the rest of the control building is provided.

This change provides specific Conditions and Required Actions for control building barrier degradation (as opposed to ventilation train degradation). The Surveillances that test the integrity of the control room barrier require a positive pressure limit to be satisfied in the control room with one required ventilation train operating. While other Surveillances in the same specification test the operability of the ventilation train, these barrier Surveillances ensure the control building envelope leak tightness is adequate to meet the design assumptions. However, there are no corresponding Conditions, Required Actions, or Completion Times associated with failure of these barrier Surveillances. Under existing specifications, LCO 3.0.3 must be entered (for two train inoperability). The proposed change would allow 24 hours (during operating MODES) to restore the capability to maintain proper control room pressure before requiring the unit to perform an orderly shutdown. Requiring the plant to enter LCO 3.0.3 when the control building envelope is not intact is excessively restrictive. The proposed change is acceptable because of the low probability of a DBA occurring during the 24 hour Completion Time, and the availability of the SFU system to provide a filtered environment (albeit with potential control building in-leakage).

This change also adds an LCO Note to allow intermittent opening of the control building barrier (e.g. as for entering and exiting) under administrative control, without entering Actions. (This is modeled after the CIV allowance to intermittently open penetrations that are otherwise required to be closed.) This change allows for intermittent opening of doors or other readily closable control building boundaries. For entry and exit through doors the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control building isolation is indicated.

These changes provide for consistency within the Technical Specifications and allow for repairs during plant operation.

IES Utilities Inc., Docket No. 50-331,
Duane Arnold Energy Center, Linn County, Iowa
Date of Amendment Request: May 10, 1999

Description of Amendment Request:

The proposed amendment:

1. Inserts NOTE for LCO 3.7.4 which states, "The control building boundary may be opened intermittently under administrative control."
2. Adds a CONDITION, REQUIRED ACTION and COMPLETION TIME to LCO 3.7.4 for when both SFU subsystems are inoperable due to inoperable control building boundary in MODES 1, 2, and 3.
3. Re-letters items in LCO 3.7.4 for consistency.
4. Revises LCO 3.7.4 CONDITION D (new CONDITION E) to add "for reasons other than CONDITION B."

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; or (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 amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. Requiring the plant to enter LCO 3.0.3 when the control building pressure envelope is not intact is excessively restrictive. This change provides less restrictive requirements for operation of the facility. These less restrictive requirements do not result in operation that will increase the probability of initiating an analyzed event. The proposed change is acceptable because of the low probability (less than 3.04×10^{-8}) of a DBA occurring during the 24 hour Completion Time, and the availability of the SFU system to provide a filtered environment (albeit with potential control room in-leakage).

Intermittent opening of the control building boundary requires controls which consist of stationing a dedicated individual at the opening who is in continuous

communication with the control room. This individual will have a method to rapidly close the opening when a need for control room isolation is indicated. For entry and exit through doors the administrative control is performed by the person entering or exiting the area. As a result, the consequences of any accident previously evaluated are not significantly increased.

- 2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. This change does not involve new or different equipment being installed at the facility. The proposed change is acceptable because of the low probability (less than 3.04×10^{-8}) of a DBA occurring during the 24 hour Completion Time, and the availability of the SFU system to provide a filtered environment (albeit with potential control room in-leakage).

Intermittent opening of the control building boundary requires controls which consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control building isolation is indicated. For entry and exit through doors the administrative control is performed by the person entering or exiting the area.

- 3) The proposed amendment will not involve a significant reduction in a margin of safety. Requiring the plant to enter LCO 3.0.3 when the control room ventilation envelope is not intact is excessively restrictive. The proposed change is acceptable because of the low probability (less than 3.04×10^{-8}) of a DBA occurring during the 24 hour Completion Time.

Intermittent opening of the control room boundary requires controls which consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control building isolation is indicated. For entry and exit through doors the administrative control is performed by the person entering or exiting the area.

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

Local Public Document Room Location: Cedar Rapids Public Library, 500 First Street SE, Cedar Rapids, Iowa 52401

Attorney for Licensee: Al Gutterman; Morgan, Lewis & Bockius, 1800 M Street NW, Washington, D.C. 20036-5869

PROPOSED CHANGE TSCR-011 TO THE DUANE ARNOLD ENERGY CENTER
TECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to amend the Technical Specifications by deleting the referenced pages and replacing them with the enclosed new pages.

SUMMARY OF CHANGES:

<u>Page</u>	<u>Description of Changes</u>
3.7-7	Add LCO 3.7.4 Note "The control building boundary may be opened intermittently under administrative control." Also add CONDITION, REQUIRED ACTION and COMPLETION TIME for when both SFU subsystems are inoperable due to inoperable control building boundary in MODES 1, 2, and 3. Re-letter items as needed.
3.7-8	Re-letter items in LCO 3.7.4 as required, and add "for reasons other than CONDITION B" to CONDITION D (new CONDITION E).
3.7-9	Re-letter items in LCO 3.7.4 as required.
B 3.7-20	Insert LCO NOTE Bases.
B 3.7-21	Add Insert 1, for inoperable control building boundary. Re-letter items as needed. Add "or control building boundary" to new C.1. and C.2.
B 3.7-22	ACTION D.1 (new ACTION E.1) add "for reasons other than an inoperable control building boundary(i.e., Condition B)". Re-letter items as needed.
B 3.7-23	Re-letter items as needed.

The Technical Specification Bases changes are included for information only.