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ENCLOSURE

PROPOSED CHANGE RTS-70 TO DAEC TECH SPEC..

PLANT NAME: Duane Arnold

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SAFETY

FOR ACTION/INFORMATION

ENVIRO

8-2-76 RKB

ASSIGNED AD:

☒ BRANCH CHIEF:

(6)

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(17)

PARRISH

ASSIGNED AD:

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SITE ANALYSIS

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CONSULTANTS

ACRS CYS 16 HOLDING SENT

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# IOWA ELECTRIC LIGHT AND POWER COMPANY

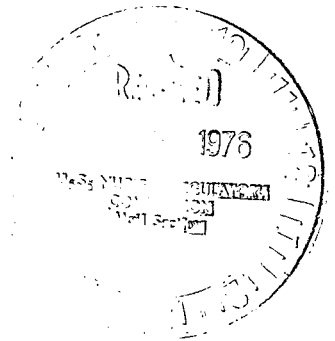
General Office  
CEDAR RAPIDS, IOWA

July 27, 1976  
IE-76-1144

LEE LIU  
VICE PRESIDENT - ENGINEERING

Mr. B. C. Rusche, Director  
Office of Nuclear Reactor Regulation  
Nuclear Regulatory Commission  
Washington, D. C. 20545

Regulatory Docket File  
50-331



Dear Mr. Rusche:

Transmitted herewith, in accordance with the requirements of 10CFR50.59 and 50.90, is an application for amendment of DPR-49 to incorporate proposed changes in the Technical Specifications (Appendix A to license) for the Duane Arnold Energy Center (DAEC), described in the enclosure hereto.

These proposed changes identified as RTS70 and RTS71, have been reviewed and approved by the DAEC Operations Committee and the DAEC Safety Committee and do not involve a significant hazards consideration.

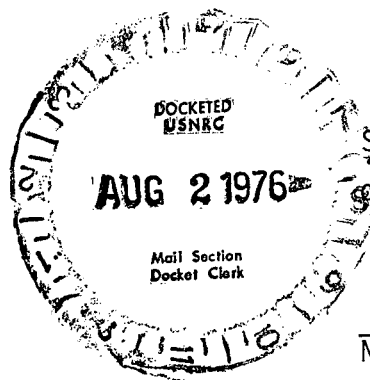
Three signed and notarized originals and 37 additional copies of this application are transmitted herewith. This application, consisting of the foregoing letter and enclosures hereto, is true and accurate to the best of my knowledge and belief.

Iowa Electric Light and Power Company

By Lee Liu  
Lee Liu  
Vice President-Engineering

LL/OS/D

cc: W/encl.  
D. Arnold  
J. Newman  
J. Keppler  
J. Shea



Sworn and subscribed to before me  
on this 27th day of July, 1976.

Jean R. Smith  
Notary Public in and for the State  
of Iowa.

Jean R. Smith  
NOTARY PUBLIC  
STATE OF IOWA  
Commission Expires  
September 30, 1978

7699

## PROPOSED CHANGE RTS-70 TO DAEC TECHNICAL SPECIFICATIONS

### I. Affected Technical Specifications

Appendix A of the Technical Specifications for the DAEC (DPR-49) provides as follows:

Table 4.1-2 provides calibration requirements for the Reactor Protection System instrumentation.

### II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following change in the Technical Specifications set forth in I above:

After the column heading "Minimum Frequency" on pages 3.1-12 and 3.1-13, add "(2)" so that it reads as follows:

"Minimum Frequency (2)"

Change note (2) to read as follows:

"Calibration test is not required on the part of the system that is not required to be operable or is tripped. If calibration is not performed on parts not required to be operable or is tripped, then the calibration test shall be performed prior to returning the system to an operable status with a frequency not to exceed those defined in the applicable table."

### III. Justification for Proposed Change

Note (2) is already a part of the Technical Specifications on page 3.1-14 and states as follows:

"Calibration test is not required on the parts of the system that are not required to be operable or are tripped but is required prior to return to service."

Note (2) has always been a part of the Technical Specifications, but the reference to it was inadvertently not made on Table 4.1-2 when the Technical Specifications were submitted to the NRC for approval. The note itself was revised so that a calibration test is not required prior to returning a system to service if it has already been tested within the required frequency.

### IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.

## PROPOSED CHANGE RTS-71 TO DAEC TECHNICAL SPECIFICATIONS

### I. Affected Technical Specifications

Appendix A of the Technical Specifications for the DAEC (DPR-49) provides as follows:

Specification 4.2 applies to the surveillance requirements of the instrumentation that initiates and controls protective functions of the DAEC.

### II. Proposed Change in Technical Specifications

The licensees of DPR-49 propose the following change in the Technical Specifications set forth in I above:

On Tables 4.2-A, 4.2-B, 4.2-C, 4.2-D and 4.2-E add "(9)" after the column headings for Instrument Functional Test and Calibration Frequency.

On Table 4.2-F add "(9)" after the column heading for Calibration Frequency.

On page 3.2-33, Notes for Tables 4.2-A Through 4.2-F, add note 9 as follows:

"Functional tests and calibrations are not required on the part of the system that is not required to be operable or is tripped. If functional tests are not performed on parts not required to be operable or are tripped, then they shall be performed prior to returning the system to an operable status with a frequency not to exceed once per month. If calibrations are not performed on parts not required to be operable or are tripped, then they shall be performed prior to returning the system to an operable status with a frequency not to exceed those defined in the applicable table."

### III. Justification for Proposed Change

The purpose of this proposed change is to remove functional test and calibration requirements for those systems which are tripped or not required for long periods of time such as during a plant refueling. By waiting to perform functional tests or calibrations until a system or part of a system is required for operation would not decrease the system's reliability and would still meet the intent of the Technical Specifications concerning scheduled surveillance, since the tests or checks are performed before the system is required for operation. This is not a new concept since it is already employed in Table 4.1-1, Reactor Protection System (SCRAM) Instrument Functional Tests.

IV. Review Procedures

This proposed change has been reviewed by the DAEC Operations Committee and Safety Committee which have found that this proposed change does not involve a significant hazards consideration.