

Iowa Electric Light and Power Company

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

March 8, 1993
NG-93-0711

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-186B): Revision of TS Section 3/4.1 and 3/4.2
(Instrumentation Requirements)

- Reference: 1) Letter, D. Mineck (IELP) to Dr. T. Murley
(NRC), NG-91-3868, dated December 19, 1991
2) Letter, J. Franz (IELP) to Dr. T. Murley
(NRC), NG-92-3686, dated August 25, 1992

File: A-117

Dear Dr. Murley:

In Reference 1 (RTS-186), Iowa Electric Light and Power Company (IELP) requested revision of Section 3.1 and 3.2 of the Duane Arnold Energy Center (DAEC) Technical Specifications (TS). The proposed amendment would make several organizational improvements and incorporates improved surveillance test intervals (STIs) and allowed outage times (AOTs) for instrumentation in the Reactor Protection System (RPS), Isolation Actuation and Emergency Core Cooling System. These improvements are based on Licensing Topical Reports issued by General Electric.

In Reference 2 (RTS-186A), we revised our original submittal to include updated language pertaining to the potential for a loss of RPS functional capability. Those changes were the result of on-going communications between the NRC and the BWR Owner's Group (BWROG).

During the review of these submittals, your staff requested some additional changes which pertain to the loss of functional capability for other protective instrumentation. We have reviewed your staff's concerns and agreed that some changes are warranted.

Consequently, we are hereby revising our proposed amendment. In addition, we are taking this opportunity to incorporate other

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minor changes to our original submittal. Please replace the appropriate pages of our original submittal (RTS-186) with the attached revised pages.

We have reviewed the evaluation of change pursuant to 10 CFR 50.92 submitted with Reference 1 and determined that the basis for the proposed no significant hazards analysis is unaffected by this revision. Therefore, the original evaluation remains valid.

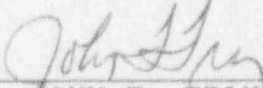
We have also determined that our previous conclusion (stated in Attachment 3 to Ref. 1) pursuant to 10 CFR 51.22 (b), that no environmental assessment or impact statement needs to be prepared, is unaffected by this application and therefore remains valid.

This application has been reviewed and approved by the DAEC Operations Committee and the DAEC Safety Committee. A copy of this submittal is being forwarded to our appointed State Official pursuant to the requirements of 10 CFR 50.91.

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

IOWA ELECTRIC LIGHT AND POWER COMPANY

By

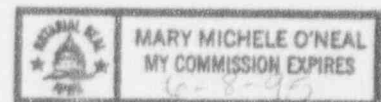

JOHN F. FRANZ
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 8th day of
March, 1993, by John F. Franz.


Notary Public in and for the State of Iowa

6-8-95
Commission Expires



JFF/LRH:so

Attachment

cc: L. Heckert
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
Stephen N. Brown (State of Iowa)
DCRC

PROPOSED CHANGE RTS-186B TO THE DUANE ARNOLD ENERGY CENTERTECHNICAL SPECIFICATIONS

The holders of license DPR-49 for the Duane Arnold Energy Center propose to revise Amendment Request RTS-186 by deleting the current pages and replacing them with the attached, new pages. The List of Affected Pages is given below.

List of Affected Pages

3.1-8*
3.1-9*
3.2-7*
3.2-15*
3.2-16*

*Page numbers reflect those assigned in Amendment Request RTS-186.

<u>Page</u>	<u>Description of Changes</u>
4.1-8	Delete the Channel Check requirement in Table 4.1-1 for the High Drywell Pressure input to the Reactor Protection System (RPS). This was a new requirement proposed in the original version of RTS-186. Further review has determined that there is no local or remote indication associated with the pressure switches which provide input to the RPS. Consequently, a channel check, as defined in Technical Specifications, cannot be performed for this trip function.
3.1-9	The Channel Functional Test interval on Table 4.1-1 for Turbine First Stage Pressure Permissive was inadvertently proposed to be changed to a monthly requirement in RTS-186. The current requirement for this trip function is "Every 3 months". In order to maintain consistency with our current requirements, this interval is being changed to quarterly.
3.2-7	Note (a) in Table 3.2-A is being revised for added clarity. RTS-186 would add Note (a) to Table 3.2-A to allow required surveillances to be performed under certain conditions. After the original submittal of RTS-186 we determined that the note should be revised to more adequately address the different types of trip logic configurations included in Table 3.2-A. The revised note will ensure that the isolation capability for each trip function is maintained during required surveillances when possible. Instruments with trip logic configurations which cannot maintain isolation capability during required surveillances are excepted from this requirement, consistent with Standard Technical Specifications (NUREG-1433).

<u>Page</u>	<u>Description of Changes</u>
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3.2-15	Note (a) for Table 3.2-B is being revised for added clarity. Note (a) was to be added to Table 3.2-B to allow required surveillances to be performed under certain conditions. The revision now proposed will more adequately address the different types of trip logic configurations included in Table 3.2-B. This will ensure that the ECCS initiation and/or trip capability for each trip function is maintained during required surveillances when possible. Instruments with trip logic configurations which cannot maintain initiation and/or trip capability during required surveillances are excepted from this requirement, consistent with Standard Technical Specifications (NUREG-1433).
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3.2-16	The original submittal of RTS-186 would have revised the Action statements for Table 3.2-B to be consistent with Standard Technical Specifications and Licensing Topical Report NEDC-30936-P-A. Subsequent to that submittal, it was determined that additional guidance was needed to differentiate between the required actions for single and multiple channel failures.
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The revision now proposed retains the 24 hour allowed outage time for single channel failures (Action 31.a and 32.a). Actions 31.b and 32.b have been added to ensure that a loss of function due to multiple channel failures does not exist for more than one hour.