

PROPOSED CHANGE RTS-275 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 revising certain current pages and replacing them with the attached, new pages. The List of Affected Pages is given below.

LIST OF AFFECTED PAGES

6.5-8

6.5-9

6.5-10

SUMMARY OF CHANGES:

The following list of proposed changes is in the order that the changes appear in the Technical Specifications (TS).

<u>Page</u>	<u>Description of Changes</u>
6.5-8	Delete all references to audit frequencies from Technical Specification Section 6.5.2.8.
6.5-9	Delete all references to audit frequencies from Technical Specification Section 6.5.2.8.
6.5-10	Delete all references to audit frequencies from Technical Specification Section 6.5.3.1.

- i. Reports and meeting minutes of the Operations Committee.

6.5.2.8 Audits

Audits of facility activities shall be performed under the cognizance of the Safety Committee. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions, at least once per 12 months.
- b. The performance, training and qualifications of the facility staff. at least once per 24 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety. at least once per six months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10CFR50. at least once per 24 months.
- e. Deleted
- f. Deleted

- g. Any other area of facility operation considered appropriate by the Safety Committee or the President.
- h. Design change package safety evaluations, at least once per 24 months.
- i. The DAEC Fire Protection Program and implementing procedures, at least once per 24 months.
- j. The Process Control Program and implementing procedures, at least once per 24 months.
- k. The Offsite Dose Assessment Manual and implementing procedures, at least once per 24 months.
- l. The radiological environmental monitoring program and the results thereof, at least once per 12 months.
- m. Performance of activities required by the QC Program for effluent and the vendors QA Program for radiological environmental monitoring.

6.5.2.9 Authority

The Safety Committee shall report to and advise the President on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

6.5.2.10 Records

Records of Safety Committee activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each Safety Committee meeting shall be prepared, approved and forwarded to the President within 14 days following each meeting.

- b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved and forwarded to the President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the President and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 Other Review and Audit

6.5.3.1 Fire Protection Inspection

6.5.3.1.1 An independent fire protection and loss prevention inspection and audit ~~shall be performed annually~~ utilizing either qualified offsite licensee personnel or an outside fire protection firm.

6.5.3.1.2 An inspection and audit by an outside qualified fire consultant, ~~shall be performed at intervals no greater than three years.~~

SAFETY ASSESSMENT

Introduction

By letter dated February 13, 1995, IES Utilities Inc. (IES) submitted a request for revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed change will delete the requirements concerning the frequency of audits from DAEC TS Sections 6.5.2.8 and 6.5.3.1. The audit frequencies will be specified in the Quality Assurance Program Description (QAPD) in the Updated Final Safety Analysis Report (UFSAR), Section 17.2.18.2.2. The proposed change will result in a more effective audit program that will contribute to improving overall performance of the organization because it allows management the flexibility, per 10 CFR 50.54(a)(3), to adjust the audit frequencies based upon the performance of the program or organization being audited.

Assessment

The proposed change will allow IES flexibility to concentrate resources on any programs or organizations with perceived weaknesses. This proposed change will result in a more effective audit program that will contribute to an improvement in overall performance of the organization because it allows management the flexibility, per 10 CFR 50.54(a)(3), to adjust the audit frequencies based upon the performance of the program or organization being audited. Any audits which are required by NRC regulation to be conducted at a specified frequency will continue to be performed at the required frequency unless a specific exemption is granted or the rule is changed.

Based on the above information, we have concluded that the proposed change to the DAEC TS is acceptable.

ENVIRONMENTAL CONSIDERATION

10 CFR 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 a significant 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 51.22(c)(9). Pursuant to 10 CFR 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 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 is administrative in nature and does not result in any change to plant design or operational strategies; therefore, there will be no increase in either the types or amounts of effluents that may be released offsite.
3. The proposed Amendment includes relocation of the audit frequency requirements from TS to the QA audit program. The change is administrative in nature and does not result in any changes to plant design or operational strategies; therefore, there will be no increase in either individual or cumulative occupational exposure.