

IES UTILITIES INC.

John F. Franz, Jr.
Vice President, Nuclear
March 1, 1995
NG-95-0759

Mr. William T. Russell, Director
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
Request for Technical Specification Change
(RTS-274): "Revision of ECCS Pump and
Valve Testing Requirements"
References: NUREG-1433, "Standard Technical
Specifications, General Electric Plants,
BWR/4"
File: A-117

Dear Mr. Russell:

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).

The proposed change will modify the pump and valve surveillance criteria for the Low Pressure Coolant Injection (LPCI) subsystem and Core Spray subsystem, as well as the Residual Heat Removal (RHR) Service Water, High Pressure Coolant Injection (HPCI), Emergency Service Water (ESW), and River Water Supply systems (henceforth referred to in the aggregate as 'the affected pumps and valves') from once every three (3) months to the frequency specified by the DAEC ASME Section XI Inservice Testing (IST) program.

This application has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. A copy of this submittal, including the analysis of no significant hazards consideration, is being forwarded to our appointed state official pursuant to the requirements of 10 CFR 50.91.

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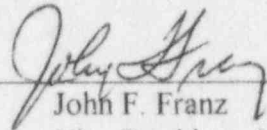
We hereby request that the proposed amendment be approved with an effective date 30 days after issuance to allow adequate time for implementation.

No new commitments are made by this letter.

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

IES UTILITIES INC.

By

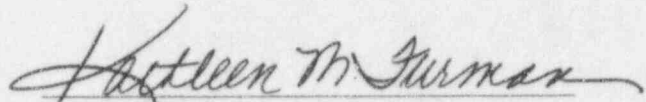


John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 1st day of March, 1995,

by John F. Franz



Notary Public in and for the State of Iowa

September 28, 1995

Commission Expires

JFF/LS/pjv

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- Attachments:
- 1) Evaluation of Change with Respect to 10 CFR 50.92
 - 2) Proposed Change (RTS-274) to the Duane Arnold Energy Center
Technical Specifications
 - 3) Safety Assessment
 - 4) Environmental Consideration

cc: L. Sueper
L. Liu
B. Fisher
L. Root
S. Brown (State of Iowa)
G. Kelly (NRC-NRR)
J. Martin (Region III)
NRC Resident Office
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EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92Background:

Sections 4.5 and 4.8 of the Duane Arnold Energy Center (DAEC) Technical Specifications (TS) currently require that various pumps and valves be tested once per three (3) months. The TS Bases for Sections 4.5 and 4.8 state that the test intervals for this equipment "...are based upon Section XI of the ASME code." Currently, altering the testing frequencies for any of the affected pumps and valves requires a revision to the DAEC TS. This results in an unnecessary burden on the NRC staff and an undue delay to the licensee because ASME/ANSI OM-6 and OM-10 already contain provisions for allowed deviations from the nominal three month testing frequencies.

The proposed change will revise the surveillance criteria for the testing of certain pumps and valves in the Low Pressure Coolant Injection (LPCI) subsystem, the Core Spray subsystems, and the Residual Heat Removal (RHR) Service Water, High Pressure Coolant Injection (HPCI), Emergency Service Water (ESW), and River Water Supply systems from every three months to the testing frequency specified by the DAEC IST program.

The proposed change is consistent with NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," which generally defers to the IST program for the testing frequencies of pumps and valves.

The DAEC is committed to performing all required pump and valve testing in accordance with ASME Section XI (OM-6 and OM-10 respectively). Section 4.6.G.1 of the DAEC TS states, "inservice testing of ASME Section XI Code Class 1, Class 2 and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a...."

IES Utilities Inc., Docket No. 50-331,
Duane Arnold Energy Center, Linn County, Iowa
Date of Amendment Request: March 1, 1995

Description of Amendment Request:

The proposed License Amendment would revise Sections 4.5 and 4.8 of the DAEC TS to reflect the changes to pump and valve testing frequency criteria.

Specifically, the proposed amendment:

1. Changes the criteria for testing frequency specified in Section 4.5.A.1.b. for Core Spray Pump Operability from "Once/3 months" to "As specified in the IST Program."

2. Changes the criteria for testing frequency specified in Section 4.5.A.1.c. for Core Spray Motor-Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
3. Changes the criteria for testing frequency specified in Section 4.5.A.3.b. for LPCI Pump Operability from "Once/3 months" to "As specified in the IST Program."
4. Changes the criteria for testing frequency specified in Section 4.5.A.3.c. for LPCI Motor-Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
5. Changes the criteria for testing frequency specified in Section 4.5.C.1.a. for RHR Service Water Pump and Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
6. Changes the criteria for testing frequency specified in Section 4.5.D.1.b. for HPCI Pump Operability from "Once/3 months" to "As specified in the IST Program."
7. Changes the criteria for testing frequency specified in Section 4.5.D.1.c. for HPCI Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
8. Changes the criteria for testing frequency specified in Section 4.5.J.1.b. for River Water Supply Pump and Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
9. Deletes the sentence "The pumps and motor operated injection valves are also tested every three months to assure their operability." from Section 4.5 BASES.
10. Changes the criteria for testing frequency specified in Section 4.8.E.1.b for ESW Pump and Motor-Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."

Basis for Proposed No Significant Hazards Determination:

The Commission has provided standards (10 CFR 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; (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 request for Technical Specification change, we have concluded:

1. The affected pumps and valves in Sections 4.5 and 4.8 will continue to be tested in accordance with ASME Section XI OM-6 and OM-10. The affected pumps and valves will continue to function as before and this change will not result in a decrease in their availability to mitigate the consequences of certain accidents and transients. The proposed amendment will not affect the consequences of these accidents and transients. Therefore, the proposed amendment does not involve a change in the probability or consequences of an accident previously evaluated.
2. The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The safety functions of the affected pumps and valves will remain unchanged. This amendment will result in no physical changes to the affected pumps, valves or systems. Consequently, the proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated.
3. The proposed amendment will not reduce the margin of safety. The actual operation of the affected pumps and valves will remain unchanged. Testing in accordance with ASME Section XI OM-6 and OM-10 will continue to provide assurance that degradation in tested components will be detected and addressed.

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: Jack Newman, Kathleen H. Shea; Morgan, Lewis & Bockius, 1800 M Street NW Washington, D.C. 20036-5869

PROPOSED CHANGE (RTS-274) 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

3.5-1
3.5-3
3.5-5
3.5-6
3.5-12
3.5-23
3.8-6

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>
3.5-1	Changes the criteria for testing specified in Section 4.5.A.1.b. for Core Spray Pump Operability from "Once/3 months" to "As specified in the IST Program."
3.5-1	Changes the criteria for testing specified in Section 4.5.A.1.c. for Core Spray Motor-Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
3.5-3	Changes the criteria for testing specified in Section 4.5.A.3.b. for LPCI Pump Operability from "Once/3 months" to "As specified in the IST Program."
3.5-3	Changes the criteria for testing specified in Section 4.5.A.3.c. for LPCI Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program".

- 3.5-5 Changes the criteria for testing specified in Section 4.5.C.1.a. for RHR Service Water Pump and Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
- 3.5-6 Changes the criteria for testing specified in Section 4.5.D.1.b. for HPCI Pump Operability from "Once/3 months" to "As specified in the IST Program."
- 3.5-6 Changes the criteria for testing specified in Section 4.5.D.1.c. for HPCI Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
- 3.5-12 Changes the criteria for testing specified in Section 4.5.J.1.b. for River Water Supply Pump and Motor Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."
- 3.5-23 Deletes the sentence "The pumps and motor operated injection valves are also tested every three months to assure their operability." from Section 4.5 BASES.
- 3.8-6 Changes the criteria for testing specified in Section 4.8.E.1.b for ESW Pump and Motor-Operated Valve Operability from "Once/3 months" to "As specified in the IST Program."

SAFETY ASSESSMENT

Introduction

By letter dated March 1, 1995, IES Utilities Inc. submitted a request for revision of the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC). The proposed changes revise the surveillance requirements for the testing of the pumps and motor-operated valves for the Low Pressure Coolant Injection and Core Spray subsystems, Emergency Service Water and the Residual Heat Removal Service Water, High Pressure Coolant Injection, and River Water Supply systems from a frequency of once per three (3) months to the frequency specified in the DAEC ASME Section XI Inservice Testing (IST) program.

Assessment

The current three month frequency for the testing of the subject pumps and motor operated valves is based on Section XI of the ASME Boiler and Pressure Vessel Code.

The DAEC IST program assures that inservice testing requirements of ASME Section XI (including OM-6 and OM-10) and approved relief requests are met. The affected pumps and motor operated valves are in the DAEC IST program. Only those changes to the testing frequencies of pumps and valves already allowed under OM-6 and OM-10 will be made without requesting approval via relief request.

Based upon the above information, we have concluded that the proposed changes to the DAEC TS are 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 makes no changes to the surveillance testing frequencies of the affected pumps and valves that will result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.
3. The proposed Amendment makes no changes to the existing surveillance testing frequencies or the testing methodology of the affected pumps and valves that would result in a significant increase in either individual or cumulative occupational exposure.