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John F. Franz, Jr.
Vice President, Nuclear

August 7, 1995
NG-95-2007

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
Revised Request for Technical Specification Change (RTS-275), Changes
to Audit Program

- References:
- 1) J. Franz (IES) to W. Russell (NRC), dated February 13, 1995,
NG-95-0538
 - 2) J. Franz (IES) to W. Russell (NRC), dated April 21, 1995,
NG-95-1205
 - 3) J. Franz (IES) to W. Russell (NRC), dated December 5, 1994,
NG-94-4459
 - 4) K. Peveler (IES) to W. Russell (NRC), dated March 8, 1995,
NG-95-0959
 - 5) NRC Letter, M.A. Ring (NRC) to Lee Liu (IES), NRC Approval of
the IES QAPD, dated March 10, 1995

File: A-117

Dear Mr. Russell:

In the submittals identified as References 1 and 2, we proposed to delete the frequency requirements for audits from Sections 6.5.2.8 and 6.5.3 of the Duane Arnold Energy Center (DAEC) Technical Specifications (TS). After further review, we propose to delete those two Sections and Section 6.5.2.10.c entirely, thus removing all reference to audits from the TS. Additionally, we are proposing to revise Section 6.5.2.9 to correspond with the change.

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An IES Industries Company

ADD 1

The current audits listed in the TS are described in the Quality Assurance Program Description (QAPD), located in chapter 17 of the Updated Final Safety Analysis Report (UFSAR), and will continue to be performed under the cognizance of the Safety Committee (see references 3 and 4). The QAPD specifies the audits which must be performed, the frequency for those audits and the personnel who will perform them. The QAPD has been approved by the NRC (see reference 5). It is recognized that the QAPD also contains other audits that are not performed under the cognizance of the Safety Committee. The next update to the QAPD will clarify which audits will continue to be performed under the cognizance of the Safety Committee, consistent with our current TS.

The proposed change will allow IES Utilities Inc. additional flexibility to adjust audit requirements based on the performance of the programs or organizations being audited.

Future changes to those requirements will be made in accordance with 10 CFR 50.54(a)(3) rather than through the license amendment process. We believe that this will result in a more effective audit program and contribute to improvement in overall performance of the DAEC.

Our request for revision of the TS (Reference 1) was prepared in accordance with 10 CFR 50.59 and 50.90. We have reevaluated the request as revised and determined that the current revision does not affect our analysis of significant hazards considerations. Therefore, we request that you replace the previously-submitted proposed TS pages 6.5-8 through 6.5-10 with the attached pages 6.5-8 through 6.5-10.

This request has been reviewed by the DAEC Operations Committee and Safety Committee. Pursuant to 10 CFR 50.92, a copy of this letter is being forwarded to our appointed state official.

This letter contains the following new NRC commitment:

1. During the next QAPD update, we will identify which audits will continue to be performed under the cognizance of the Safety Committee. The next update is scheduled to be completed by January 15, 1996.

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

IES UTILITIES INC.

By *John F. Franz*
John F. Franz
Vice President, Nuclear

State of Iowa
(County) of Linn

Signed and sworn to before me on this 4 day of August, 1995,
by John F. Franz.

Hennetta M. Cramer
Notary Public in and for the State of Iowa

9/11/97
Commission Expires

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Attachment: 1) Proposed Change (RTS-275) to the Duane Arnold Energy Center
Technical Specifications

cc: H. Tran
L. Liu
L. Root
B. Fisher
G. Kelly (NRC-NRP)
H. J. Miller (Region III)
S. Brown (State of Iowa)
NRC Resident Office
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