Iowa Electric Light and Power Company

August 25, 1992

NG-92-3686

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op License No: DPR-49
Request for Technical Specification Change (RTS-186A): Revision of TS Sections 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, C. Rossi (NRC) to G. Beck (BWROG), dated July 26, 1991

File: A-117

Dear Dr. Murley:

In Reference 1 (RTS-186), Iowa Electric Light & 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, Isolation Actuation and Emergency Core Cooling System. These improvements are based on Licensing Topical Reports issued by General Electric.

Consistent with the requirements of Reference 2, our original submittal added to the Reactor Protection System (RPS) Limiting Conditions for Operation (LCO) clarifying language suggested by the BWR Owner's Group (BWROG) to ensure that the potential for a loss of RPS functional capability is addressed. This language was subsequently revised, following extensive review by the NRC and the BWROG. IELP has reviewed the revised language and concluded that a revision to our proposed TS amendment is warranted.

A001
1/1

Consequently, we are revising our proposed amendment to the RPS LCO to be consistent with the language agreed upon by the NRC and the BWROG. In addition, we are taking this opportunity to incorporate additional clarif ations to our submittal which are administrative in nature. Please replace the appropriate pages of our origina. 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 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 & POWER COMPANY

By _____
John F. Franz, Jr.
Vice President, Nuclear

State of Iowa
(County) of Linn
Signed and sworn to before me on this 25th day of August,
1992, by John F. Franz, Jr.

_____
Notary Public in and for the State of Iowa

September 28, 1992
Commission Expires

JFF/LRH:so
Attachment
cc: L. Heckert
L. Liu
L. Root
R. McGaughy
C. Shiraki (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident Office
Stephen N. Brown (State of Iowa)

PROPOSED CHANGE RTS-186A TO THE DUANE ARNOLD ENERGY CENTER TECHNICAL 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 the Affected Pages is given below.

List of Affected Pages

Page 2 (Attachment 1 to RTS-186)
3.1-1 (Attachment 2 to RTS-186)
3.1-12 (Attachment 2 to RTS-186)
3.2-43 (Attachment 2 to RTS-186)

Summary of Changes

The following list of proposed changes is in the order that the changes appear in Amendment Request RTS-186.

Page	Description of Changes
Attachment 1 Page 2	In October 1985, the NRC met with the BWROG Technical Specification Improvements (TSI) Committee to review NEDC-30851P. In response to NRC information requests at this meeting, GE issued letter OG5-491-12 from L. Rash (GE) to T. Collins (NRC) dated November 25, 1985. The NRC's SER for NEDC-30851P, dated July 15, 1987, required the licensee to confirm that the results presented in Enclosure 1 of this letter are bounded by our plant-specific analysis. IELP's review of this letter is being documented in the background section of the Evaluation of Change Pursuant to 10 CFR 50.92.
Attachment 2 Page 3.1-1	The RPS Action statements in TS Section 3.1.A have been revised to be consistent with the language agreed upon by the NRC and the BWR Owner's Group Technical Specification Improvement Committee. These changes improve clarity and will ensure that the compensatory measures for channel or trip system inoperability are consistently applied.
Attachment 2 Page 3.1-12	The Bases for Section 3.1 is revised to state that the reactor water level trip settings represent indicated water level. This is necessary since the proposed TS revision will remove the reference to indicated water level in the Trip Level Setting column of the existing instrument tables.
Attachment 2 Page 3.2-43	The Bases for Section 3.2 is revised to state that the reactor water level trip settings represent indicated water level. This is necessary since the proposed TS revision will remove the reference to indicated water level in the Trip Level Setting column of the existing instrument tables.

The calibration intervals for the DAEC instrumentation addressed by these LTRs have been verified to be equal to or longer than once per quarter and are therefore unaffected by the proposed changes.

3. Confirm that the differences between the parts of the RPS that perform the trip functions in the plant and those of the base case plant were included in the analysis for the plant using the procedures of Appendix K of NEDC-30851-P-A, or provide plant-specific analyses to demonstrate that there is no appreciable change in RPS availability or public risk.

   The GE plant-specific report for the DAEC utilizes the procedures of NEDC-30851-P-A, Appendix K to identify and evaluate the differences between the parts of RPS that perform the trip functions at the DAEC and those of the base case plant. The results indicate that while there are several differences, those differences and their impact do not significantly affect the improvement in plant safety achieved in the generic analysis. In addition, we have reviewed the results presented in Enclosure 1 to letter OG5-491-12 from L. Rash (GE) to T. Collins (NRC) dated November 25, 1985, and determined that there is no significant impact on the conclusions of the DAEC plant-specific report. Therefore, the results of LTR NEDC-30851-P-A are applicable and the DAEC is bounded by the generic analysis and the corresponding NRC SER.

For the remaining LTRs (References 2 through 5) being implemented in this proposed revision, the following conditions must be satisfied.

1. Confirm the applicability of the generic analyses to the DAEC.

   Appendix B of References 2, 3 and 4 identifies IELP as a participating utility in the development of the corresponding analyses. Reference 5 was purchased by IELP after it was developed and approved by the NRC. GE was commissioned to perform plant-specific evaluations of the modifications to the STIs and AOTs for References 2 through 5. These evaluations (References 6, 7 and 8) determined the differences between DAEC and the generic model and concluded that the proposed changes to Technical Specifications would meet the acceptance criteria stated in the respective LTRs. Therefore, the generic analyses are applicable to and bounds the design of DAEC.

2. Confirm that any increase in instrument drift due to the extended STIs is properly accounted for in the setpoint calculation methodology.

   Instrument setpoint drift is monitored during channel calibration tests when setpoints are required to be verified, not during the performance of the channel functional tests. As previously stated, a concern exists for plants that have calibration