



ALLIANT ENERGY.

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, D.C. 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to a Notice of Violation Transmitted with NRC Office of
Investigations Report No. 3-1999-032
File: A-105, A-102

Dear Sir:

This letter and attachment are provided in response to the Notice of Violation transmitted with NRC Office of Investigations Report No. 3-1999-032.

If you have any questions regarding this matter, please feel free to contact my office.

Sincerely,

David L. Wilson
Vice President - Nuclear

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Investigations Report No. 3-1999-032

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**Alliant, IES Utilities Inc.
Reply to a Notice of Violation
Transmitted with NRC Office of Investigations
Report No. 3-1999-032**

VIOLATION:

During an NRC investigation completed February 23, 2000, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification 5.4.1.a requires, in part, that written procedures shall be implemented covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," Section 2.k., states, in part, that procedures for the preparation for refueling and refueling equipment operation should be performed in accordance with written procedures.

Step 4.1 (1) Refuel Floor Procedure 402, "Fuel Movement Within the Spent Fuel Pool," Rev. 6, (a procedure required by Section 2.k for RG 1.33), requires that for fuel handling within the spent fuel pool, the fuel moving crew shall consist of the following personnel: (a) Fuel Handling Supervisor; (b) Fuel Handlers(2) – one of which is designated a Spotter; and (c) Reactor Engineer.

Contrary to the above, on August 11, 1999, the fuel moving crew did not consist of a fuel handling supervisor, fuel handlers (2), and a reactor engineer, when fuel handling occurred in the spent fuel pool. Specifically, the reactor engineer was not present when the two new fuel bundles were moved in the spent fuel pool.

This is a Severity Level IV Violation (Supplement 1).

RESPONSE TO THE VIOLATION:

1. REASON FOR THE VIOLATION

On August 11, 1999, activities were underway for new fuel receipt and inspection in accordance with Refueling Procedure (RFP) 401, "New Fuel Receipt,

Inspection, and Channeling,” and RFP 402, “Fuel Movement Within The Spent Fuel Pool.” These activities include moving new fuel bundles from the fuel preparation machines into the fuel storage racks in the fuel pool. RFP 402 requires, in part, that for fuel handling within the spent fuel pool, the fuel handling crew shall consist of the following personnel: Fuel Handling Supervisor, Fuel Handlers (2) (one of which is designated as a spotter), and a Reactor Engineer (RE). Towards the end of the day, the RE assigned to the fuel moving crew, believing that the fuel moving activities had concluded for the day, left the refueling floor. The remaining fuel moving crew did not notice the RE had left until they looked to the RE to verify that a fuel bundle they were moving from a fuel preparation machine to the fuel racks was properly oriented above the correct grid location (previously identified by the RE prior to leaving the floor). When the absence of the RE was recognized, the Fuel Handling Supervisor concluded that he could also fulfill the responsibilities of the RE and informed the Fuel Handler and the Fuel Spotter that he would act in the RE capacity. On that basis the fuel movement continued. The fuel bundle that already had been grappled was correctly placed into the fuel rack. A second bundle of fuel was then grappled and moved from the preparation machine to the correct location in the fuel rack. The Fuel Handling Supervisor, acting as the RE, then updated and signed the ICA Transfer Log correctly showing the fuel locations in the fuel racks.

On August 12, 1999, the RE Supervisor initiated an Action Request (AR) to document the fact that the RE had left before fuel movement was concluded and communicated this to the Fuel Handling Supervisor. The RE supervisor recommended that this AR be an action level five (no action required, trend only). The Fuel Handling Supervisor then reviewed the procedural requirements, determined that these actions were in violation of RFP 402, and initiated another AR to identify the procedure violation in regards to not having an RE present during fuel movement. After discussions with the Control Room regarding the potential procedural non-compliance, the level 5 AR was replaced with the AR initiated by the Fuel Handling Supervisor.

2. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

On August 13, 1999, after discovery that fuel moves were made in the fuel pool without the presence of an RE, the two fuel bundles that were moved were verified to be in the correct location and properly seated. No discrepancies were identified.

A Fact Finding Meeting was held on August 13, 1999. As a result, it was concurred that a procedural violation occurred during the performance of the fuel

moves. The summary of the Fact Finding Meeting was published in the site newsletter to disseminate the information to all site personnel.

In response to statements made during the Fact Finding Meeting, an investigation was conducted to determine whether the Fuel Handling Supervisor knew at the time of deciding to act as RE, that this action was in violation of procedure. The investigation determined that at the time of the violation the Fuel Handling Supervisor did not recall that the procedure required that a fuel moving crew consist of at least four individuals. This conclusion was based on the fact that the Fuel Handling Supervisor did not appear to recognize the procedure violation prior to reviewing the applicable procedures on August 12, 1999.

The individual involved was entered into the Employee Accountability Program. The individual's performance was determined to be in need of improvement in the following areas: procedure adherence, attention to compliance during times of perceived, self-imposed schedule pressure (as a result of this issue and previous issues), and direct involvement in activities rather than oversight. As a result, the individual was disciplined and required to receive weekly counseling from his immediate supervisor and to provide weekly progress reports regarding his Performance Improvement Plan. The Performance Improvement Plan included the following actions:

- Complete a review and or walk through of RFPs to ensure they can be performed as written.
- Complete formal RE qualifications.
- Complete several on the job observations specifically focusing on strict procedural adherence.
- Prepare and present a presentation on the importance of procedural adherence using references from in-house, NRC and INPO Operating Experience, to site management and personnel.

Fuel handling procedures were enhanced to provide additional guidance concerning responsibilities, expectations and authorities of Fuel Handling Supervisors and fuel handling crews. Included in the guidance is a requirement for the members of a fuel handling crew to notify the Fuel Handling Supervisor prior to leaving the refuel floor.

Additionally, DAEC management continues to stress the importance of strict procedural adherence during ongoing plant activities.

3. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

All corrective actions to avoid further violations have been completed.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on August 13, 1999 with the verification of the RE procedural requirements.