



August 19, 2005


NG-05-0454
10 CFR 50.73

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

Duane Arnold Energy Center
Docket 50-331
License No. DPR-49

Licensee Event Report #2005-003-00

Please find attached the subject Licensee Event Report (LER) submitted in accordance with 10 CFR 50.73. There are no new commitments contained within this report. Should you have any questions regarding this report, please contact this office.


Gary D. Van Middlesworth
Site Vice President, Duane Arnold Energy Center
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC
Project Manager, DAEC, USNRC
Resident Inspector, DAEC, USNRC

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1) Duane Arnold Energy Center	DOCKET NUMBER (2) 05000331	PAGE (3) 1 of 3
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TITLE (4)
Inadequate Procedure Leads to Unplanned Mode Change while Performing Scram Time Testing

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	26	2005	2005	003	00	08	19	2005	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 3: (Check all that apply) (11)							
POWER LEVEL (10)		0	20.2201(b)			20.2203(a)(3)(ii)			50.73(a)(2)(ii)(B)	50.73(a)(2)(ix)(A)
			20.2201(d)			20.2203(a)(4)			50.73(a)(2)(iii)	50.73(a)(2)(x)
			20.2203(a)(1)			50.36(c)(1)(i)(A)			50.73(a)(2)(iv)(A)	73.71(a)(4)
			20.2203(a)(2)(i)			50.36(c)(1)(ii)(A)			50.73(a)(2)(v)(A)	73.71(a)(5)
			20.2203(a)(2)(ii)			50.36(c)(2)			50.73(a)(2)(v)(B)	OTHER Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iii)			50.46(a)(3)(ii)			50.73(a)(2)(v)(C)	
			20.2203(a)(2)(iv)			50.73(a)(2)(i)(A)			50.73(a)(2)(v)(D)	
			20.2203(a)(2)(v)		x	50.73(a)(2)(i)(B)			50.73(a)(2)(vii)	
			20.2203(a)(2)(vi)			50.73(a)(2)(i)(C)			50.73(a)(2)(viii)(A)	
			20.2203(a)(3)(i)			50.73(a)(2)(ii)(A)			50.73(a)(2)(viii)(B)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Robert Murrell, Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) 319-851-7900
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 26, 2005, with the reactor shutdown for refueling in Mode 4, a violation of the requirements of TS 3.10.1 occurred. Specifically, after completion of the reactor coolant system hydrostatic test and code required Visual Test (VT) - 2 inspections, a violation of the requirements of TS 3.10.1 occurred by remaining above 212°F, an unplanned transition from Mode 4 to Mode 3 without completing all of the Mode 3 TS requirements, while conducting control rod scram time testing. The noncompliance of TS 3.10.1 continued through April 27, 2005, when control rod scram time testing was completed and a reactor coolant system cool-down commenced.

To correct this issue, on July 22, 2005, STPs 3.10.1-01 and 3.10.1-02 were quarantined to prevent scram time testing during vessel hydro.

The cause of this event was the failure to recognize that the procedure changes made to allow for Scram Time Testing under extended vessel hydro conditions was contrary to TS.

There were no actual safety consequences and no effect on public health and safety as a result of this event. This event is reportable under 10CFR50.73(a)(2)(i)(B).

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Duane Arnold Energy Center	05000331	YEAR 2005	SEQUENTIAL NUMBER -- 003	REVISION NUMBER -- 00	2 of 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

I. Description of Event:

In 1999, the Duane Arnold Energy Center (DAEC) modified procedures to allow Scram Time Testing during the performance of the Class 1 leak tests. This change was implemented after a multi-disciplined team (Solutions Team) reviewed industry operating experience and various TS LCOs. Specifically, the Solutions Team was formed based upon industry experience that other Boiling Water Reactors (BWRs) were performing Scram Time Testing during leak testing. The Solutions Team evaluated the TS requirements and concluded that the use of various Special Operations LCOs would be needed to allow concurrent testing. The team concluded that TSs had no restrictions as to the number or combination of Special Operations LCOs that could be entered simultaneously. Procedures were subsequently modified to adopt this industry practice.

The specific procedure changes to support scram time testing during leak testing were associated with the Surveillance Test Procedure (STP) 3.10.1-01, "Non-Nuclear Heat Class 1 System Leakage Pressure Tests," and STP 3.10.1-02, "Non-Nuclear Heat Class 1 Ten Year System Leakage Pressure Test." A 10 CFR 50.59 screening was performed in 1999 for the procedure changes that were made to STPs 3.10.1-01 and STP 3.10.1-02. In that screening, it was concluded that the procedure changes did not require a change to the Technical Specifications. Part of the procedure changes associated with the screening added steps to hold the reactor pressure at 850-950 pounds per square inch gauge (psig) after the completion of the reactor system hydrostatic test and the Visual Test (VT) - 2 inspections to allow performance of Scram Time Testing.

Subsequent to these procedure changes, scram time testing was performed in the four refueling outages between 1999 and 2005. During each performance of scram time testing, the vessel hydro conditions were extended past the VT-2 inspections performed for the vessel hydro to allow for completion of the scram time testing.

II. Assessment of Safety Consequences:

This report is being submitted pursuant to 10CFR50.73(a)(2)(i)(B).

This event did not affect the availability of other systems needed to maintain safe shutdown conditions, remove residual heat, control the release of radioactive material, or mitigate the consequences of an accident.

Therefore, there were no actual safety consequences associated with this event. There was no effect on public health and safety as a result of this event.

This event did not result in a Safety System Functional Failure.

III. Cause of Event:

The cause of this event was the failure to recognize that the changes made to allow for Scram Time Testing under extended vessel hydro conditions were contrary to TS.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Duane Arnold Energy Center	05000331	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 of 3
		2005	-- 003	-- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

IV. Corrective Actions:

On July 22, 2005, STPs 3.10.1-01 and 3.10.1-02 were quarantined to prevent scram time testing during vessel hydro.

DAEC will submit a plant-specific license amendment request to implement TSTF-484, "Use of TS 3.10.1 for Scram Time Testing activities," after approval by NRC. This action is anticipated to be completed by March 1, 2006.

EIIS System and Component Codes:

N/A – There were no component failures.

V. Additional Information:

Previous Similar Occurrences:

A review of LERs at the DAEC over the last 3 years identified the following LERs with similar events.

LER 2002-01, Unplanned Mode Change while Re-Aligning the RHR System from Shutdown Cooling Mode to Low Pressure Coolant Injection Standby Readiness During Reactor Startup.

LER 2003-002, Inadequate Procedure Leads to Failure to Remove Key from Mode Switch when Locked in Refuel Position During Control Rod Movement as Required by Technical Specifications.

LER 2003-03, Reactor Mode Change with an LCO in effect in Violation of Technical Specification 3.0.4.