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IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA
DUANE ARNOLD ENERGY CENTER
PALO, IOWA
NOVEMBER 6, 1974
DAEC - 74 - 386

Regulatory File 6y.

Mr. James Keppler, Director Regulatory Operations Regional Office U. S. Atomic Energy Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

SUBJECT: Technical Specification Violation 74-11,

License DPR-49, Duane Arnold Energy Center, Unit #1, Table 4.1-1 of Appendix A to the

Operating License.

FILE: A-110 A-117

Dear Mr. Keppler:

This letter is to report to you with respect to certain Technical Specification surveillance requirements at the Duane Arnold Energy Center.

Problem

IRM functional testing was not performed prior to a reactor startup as required by Operating License DPR-49, Appendix A, Specification 4.1.A.1, Table 4.1-1.

Investigation

Following an inadvertent reactor scram, a reactor startup was commenced at 1250 hours on October 19, 1974. IRM functional testing was not performed prior to the startup as the result of an administrative error in the Integrated Plant Operating Instructions (IPOI). On September 16, 1974, the DAEC Operations Committee approved a change to the IPOI which required the performance of Surveillance Test Procedures (STP) 41A004, 41A017 and 42C004 prior to each reactor startup. (STP 41A004 is the IRM functional test and calibration procedure). During the preparation of the final copy of the revision to the IPOI, a typographical error omitted 41A004 from the list of tests required to be performed prior to a reactor startup.

A contributing factor in the failure to perform STP 41A004 is an inconsistency between Tables 4.1-1 and 4.2-C of the Technical Specifications. Table 4.1-1 requires that STP 41A004 be performed prior to each startup.

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Table 4.2-C, note 2, implies that the required frequency for performance of STP 41A004 is one week and since STP 41A004 had been performed during the previous week, personnel responsible for scheduling surveillance tests assumed the test would not have to be repeated for the reactor startup on October 19, 1974. It should be noted that on October 18, 1974, the DAEC Operations Committee and Safety Committee approved a proposed change to the Technical Specifications which will revise Table 4.1-1 such that the minimum required frequency for performance of IRM functional testing will be one week. If approved by the USAEC, the change will bring the requirement for IRM functional testing in line with the requirements for similar instrumentation.

Corrective Actions

The typographical error in the Integrated Plant Operating Instructions has been corrected. STP 41A004 will be performed prior to each reactor startup pending USAEC approval of the proposed Technical Specification revision.

Conclusion

The contents of this report, including corrective actions, was reviewed and approved by the DAEC Operations Committee on November 5, 1974. The Committee concluded that the violation did not present a significant hazard to the health and safety of the public.

Very truly yours,

G. G. Hunt

Chief Engineer

Duane Arnold Energy Center

DLW:GGH:bh

CC: E. G. Case

C. W. Sandford

J. A. Wallace

E. L. Hammond

B. R. York

D. L. Wilson

H. W. Rehrauer-Chairman, Safety Committee

L. D. Root

J. R. Newman

R. R. Rinderman

B. L. Hopkins