DISTRIBUTION FOR PART 50 DOLET MATERIAL (TEMPORARY FORM)

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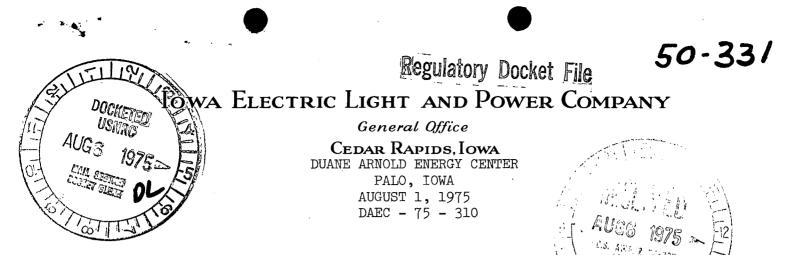
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FILE: INCIDENT REPORT FILE

FROM: Iowa Elec. Light & Pwr. C Palo, Iowa G.G. Hunt		•DATE OF DOC	DAT	E REC'D	LTR	TWX	RPT	OTHER	
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Mr. James G. Keppler, Director Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission - Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137

> Subject: Technical Specification Violation 75-8 File: A-110, A-117

Dear Mr. Keppler:

This letter is to report a violation of certain Technical Specification requirements at the Duane Arnold Energy Center.

Problem

During a routine audit of surveillance test results the following discrepancies were found:

- A) The HPCI system was declared inoperable on April 14, 1975. The surveillance requirements for the period after the first day of HPCI inoperability call for a demonstration of ADS system logic and RCIC system operability in order to continue plant operation. The HPCI System Inoperable Test Package for April 16, 1975 consisting of Surveillance Test Procedure (STP) 42B012, "ADS Trip System Logic Functional Test and Calibration", and STP 45E001, "RCIC System Operability Tests" cannot be found.
- B) Surveillance Test Procedure (STP) 47D003, "PCIS Valve Functional Test (Quarterly)" was scheduled to be performed on March 26, 1975. The test was started but a problem was discovered which prevented completion of the test. The problem delaying completion of the test was remedied on April 3, 1975, but STP 47D003 was inadvertently not completed until May 14, 1975 which is outside of the allowable time tolerance.

Investigation

A) Even though the results for the HPCI System Inoperable Test cannot be found, the Shift Supervisor's Log Book indicates that these tests were completed satisfactorily. The test results for each other day of HPCI system inoperability are on file and their completion noted in the log. It is felt that this is sufficient evidence that the HPCI System Inoperable Test was completed on April 16, 1975 and Technical Specification requirements were thus met.

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- TSV 75-8 Page 2 August 1, 1975 .
 - B) When STP 47D003 could not be completed on March 26, 1975, a problem sheet was filled out and the repair completed seven days later. The STP was laid aside while the repair was completed and inadvertently not remembered until it was found, uncompleted some time later. When it was completed on May 14, 1975 the test was satisfactory and the PCIS could have performed its intended function during this time had it been necessary.

Corrective Action

Both of the occurrences described above are isolated instances. The present system of transmitting and storing test results seems to be adequate and the loss of one data package does not appear to be reason enough to try and develop a new procedure for handling results which might turn out to be not as efficient as the present system. The second occurrence described is one which had not occurred before. Generally if maintenance is required before an STP can be completed it is something which can be completed in a matter of hours and not days. The person performing the test then has no trouble remembering the uncompleted test. The only corrective action proposed at this time, therefore, is to remind personnel of the importance of retaining test results and being sure tests are completed on time.

Conclusion

The DAEC Operations Committee reviewed and approved this report on August 1,1975 and concluded that there was no hazard to the health and safety of the public.

Very truly yours,

G. G. Hunt Chief Engineer Duane Arnold Energy Center

OCS/GGH/mg

cc: B. C. Rusche

- C. W. Sandford
- J. A. Wallace

L. Liu

- E. L. Hammond
- B. R. York
- J. H. Gebert
- D. A. Moen
- R. R. Rinderman
- L. D. Root
- H. W. Rehrauer Safety Committee Chairman
- G. A. Cook
- D. L. Wilson
- J. R. Newman