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IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA
LDR-79-134

August 2, 1979

50-331

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter is in response to your request for additional information regarding our submittal to IE Bulletin No. 79-08. We trust the attached response completely addresses your concerns.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/JZ/1h

cc: U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
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Additional Response to NRC IE Bulletin No. 79-08

Item No. 2

Question: Clarify your responses to indicate whether the following systems are isolated on all safety injection initiations:

- Main Steam
- Reactor Water Sample Line
- Containment Atmospheric Control System
- Main Steam Isolation Valve Leakage Control System

Response: Safety injection demand signals are low low reactor water level or high drywell pressure for the HPCI and RCIC systems, and low low low reactor water level or high drywell pressure for the core spray and LPCI systems.

The main steam lines isolate on a low low reactor water level. The main steam isolation valves do not close on high drywell pressure since high drywell pressure alone is not indicative of a loss of coolant accident. They remain open to remove heat from the reactor and isolate when one of the following occurs:

1. Low low reactor water level
2. High radiation in the main steam lines
3. High steam flow
4. High steam tunnel temperature
5. Low main steam line pressure (in run mode)

The reactor water sample line isolates on low low reactor water level or high drywell pressure.

The containment atmospheric control system isolates on low reactor water level (prior to the low low reactor water level signal) or high drywell pressure.

The main steam isolation valve leakage control system is a normally isolated system and has no isolation signal associated with safety injection initiation. The main steam isolation valve leakage control system is designed to be manually initiated after it has been determined that a LOCA has occurred. The system is isolated at all other times except for testing. The valve positions are checked monthly during operability testing and operators are instructed to keep this system isolated during operation. The system is also inhibited from operating unless the inboard MSIV associated with the MSIV-LCS subsystem is closed and the reactor vessel pressure is less than 35 psig. Once the system has been actuated, it will automatically isolate in the event that either gross leakage through an inboard MSIV is indicated or if total leakage through both MSIV's becomes excessive.

Item No. 3

Question: For the manual action related to restart and continued RCIC operation, and for any other manual actions required specify whether these actions are addressed by written procedures.

Response: The manual actions required for restarting and continued operation of RCIC are specified in Operating Instructions No. 50, Reactor Core Isolation Cooling System. No other manual actions are necessary during a loss of the main feedwater system.

Item No. 4

Question: Clarify your response to indicate whether operators have been instructed to utilize other available information to initiate safety systems. Provide your schedule for completion of this action.

Response: All operators have been instructed to utilize other available information when initiating safety systems. This instruction was completed by July 1, 1979.

Item No. 5

Question: Your response to item 5a does not address the matter of unsafe plant conditions. Amend your response to address this matter.

Response: Operating procedures require that safety systems not be overridden until the operator is assured that the core is adequately covered with water and the situation has been analyzed. No other conditions of higher priority are addressed.

Question: Provide a schedule for any actions on item 5 that have not yet been completed.

Response: All actions required by item 5 will be completed by August 6, 1979.

Item No. 6

Question: Please augment your response to indicate the extent to which position and locking device checks are performed for locked safety system valves.

Response: The initial response, by the DAEC, to IE Bulletin 79-08, item (6) states that: Valve positions for normal system operation for all safety related valves are indicated on a "Pre start-up Valve Checklist" which is attached as an appendix to each System Operating Instruction in the DAEC Operations Manual and is utilized at each start-up for the individual system. Each system checklist also contains the required positions for all locked safety valves in that system. As such, all locked safety valves are subject to the checks provided in the DAEC Operations Manual.

Evolutions such as the performance of Surveillance Test Procedures and plant maintenance were discussed in the initial response to this item. In each case, adequate procedural controls and checks exist to assure correct system alignment with respect to locked safety valves.

Item No. 7

Question: Provide a schedule for completing procedures to prevent inadvertent transfer of radioactive gases and liquids upon resetting containment isolation instrumentation; discuss how these procedures will prevent inadvertent transfers.

Response: Procedures to prevent inadvertent transfer of radioactive gases and liquids upon resetting containment isolation are now being prepared. It is anticipated that these procedures will be completed by August 6, 1979. These procedures caution the operators not to reset the isolation until the consequences of resetting have been reviewed.

Item No. 8

Question: We understand from your response that operability is verified for a redundant safety related system prior to removal of any safety related system from service. Since you may be relying on prior operability verification within the current technical specification surveillance interval, operability should be further verified by at least a visual check of the system status to the extent practicable, prior to removing the redundant equipment from service. Please supplement your response to provide a commitment that you will revise your maintenance and test procedures to adopt this position.

Response: The "Inoperable Packages" described in our previous response require that operability be verified by testing irregardless of previous surveillance testing done in accordance with the Technical Specifications.

Question: It is not clear from your response that all involved reactor operational personnel in the oncoming shift are explicitly notified about the status of systems removed from or returned to service. Please indicate how this information is transferred at shift turnover.

Response: Presently the oncoming Shift Supervising Engineer and Nuclear Station Operating Engineer are required to review the Shift Supervising Engineers log and the Operating log entries for the past 24 hours or since they were last on shift, whichever is shorter. This is signified by the Operating Engineer and Shift Supervising Engineer placing his initials in the margin of the log books on each page. Whenever a safety system is removed from or returned to service, it is recorded in the Shift Supervising Engineer's Log and the Operating Log in accordance with Procedure ACP 1404.4, "Operating Logs". This insures that oncoming shift personnel are made aware of the status of systems removed from or returned to service.