

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

NOV 24 1976

Iowa Electric Light and  
Power Company  
ATTN: Mr. Duane Arnold  
President  
IE Towers  
P. O. Box 351  
Cedar Rapids, Iowa 52406

Docket No. 50-331

Gentlemen:

Thank you for your letter dated October 29, 1976, informing us of the steps you have taken to correct the noncompliance identified in our letter dated October 7, 1976.

With regards to your response to items 6.a and 6.b we wish to point out that:

- 6.a. The new CRD cooling water supply was installed for the sole purpose of reducing the probability of collet cracking, since the latter could prevent rod scram, therefore, this subsystem is not altogether unrelated to nuclear safety.
- 6.b. The detailed written procedures for the MSIV-LCS did not include all required operator actions. For instance, the action required to ensure that < 360 scf/hr would be maintained in case one subsystem high flow interlock was bypassed and the flow meter was pegged (flow trips at 90 scf/hr and flow meter pegs at 100 scf/hr).

We will examine your corrective action during future inspections. Since your corrective action consists mainly of personnel reinstruction our



Iowa Electric Light and  
Power Company

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evaluation will monitor the short and long range effectiveness of your  
reinstruction program.

Your cooperation with us is appreciated.

Sincerely yours,

*James G. Keppler*  
James G. Keppler  
Regional Director

cc: Mr. G. G. Hunt  
Chief Engineer  
J. A. Wallace  
Vice President-  
Generation

cc w/ltr dtd 10/29/76:  
Central Files  
Reproduction Unit NRC 20b  
PDR  
Local PDR  
NSIC  
TIC

# IOWA ELECTRIC LIGHT AND POWER COMPANY

*General Office*  
CEDAR RAPIDS, IOWA

October 29, 1976

JAMES A. WALLACE  
VICE PRESIDENT - GENERATION

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

Re: Duane Arnold Energy Center

Subject: Response to letter from James G. Keppler  
to Duane Arnold dated October 7, 1976

File: A-110b Inspection Report 76-21

Dear Mr. Keppler:

This letter is in response to your letter of October 7, 1976 concerning an inspection of activities at the Duane Arnold Energy Center conducted on August 18-20, 31 and September 1-3, 1976. The following responses indicate the actions which have been or shall be taken to correct the infractions, deficiencies, deviations and the concern in your cover letter.

## Cover Letter Concern

We appreciate your concern about what appears to be a lack of improvement in time to complete some of the more complex maintenance and design changes. However, without a more definitive description relative to the inter-relationship of our supervisory training and personnel adjustments to this apparent lack of improvement, we plan to improve our management control system in the following manner:

1. During the many NRC site inspections, these improvements have been discussed with the NRC inspector in a rather random fashion, thus the status and progress has not been as definitive as possible. In the future, the DAEC staff will prepare a detailed list that will outline the major design or maintenance problems, progress of each solution, and anticipated resolution dates. This informal list will be updated monthly with this data. This list will be available to the NRC inspector at the time of his on-site inspections and any concerns or shifts in NRC priority importance can be discussed at that time.

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Infraction 1

Contrary to Technical Specifications 3.8.B.1 and 4.8.B.1, plant operation continued for approximately six hours on July 26, 1976 after diesel generator 1G-31 was made inoperable for maintenance without immediately demonstrating that the remaining diesel generator and low pressure core cooling and containment cooling subsystems were operable.

Response

1. Corrective action taken and the results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

Appropriate operating personnel will be reinstructed to follow established criteria and guidelines agreed upon with the NRC relative to demonstration of operable equipment during maintenance periods.

3. Date when full compliance will be achieved:

Reinstruction will be completed by November 15, 1976.

Infraction 2.a

Contrary to 10CFR50, Appendix B, Criterion V, some activities affecting quality were not accomplished in accordance with documented instructions as follows:

Contrary to ACP 1408.4, Revision 3, the operator failed to enter in the Operating Log when the diesel generator 1G31 was taken out of service and when it was returned to service on July 26, 1976.

Response

1. Corrective action taken and results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

All plant operators and shift supervisors shall be reinstructed in the importance of adhering to the requirements set forth in the Administrative Control Procedures, particularly those requirements that apply to the Operations Department.

3. Date when full compliance shall be achieved:

Corrective actions shall be completed by November 15, 1976.

Infraction 2.b

Contrary to 10CFR50, Appendix B, Criterion V, some activities affecting quality were not accomplished in accordance with documented instructions as follows:

Contrary to ACP 1401.4, approximately 75% of the Maintenance Action Requests (MAR) reviewed lacked the reviews, approval or information required.

Response

1. Corrective action taken and results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

All plant maintenance personnel, including supervisors, shall be reinstructed in the importance of adhering to the requirements set forth in the Administrative Control Procedures, particularly those that apply to the Maintenance Department.

3. Date when full compliance shall be achieved:

Corrective action shall be completed by November 15, 1976.

Infraction 2.c

Contrary to 10CFR50, Appendix B, Criterion V, some activities affecting quality were not accomplished in accordance with documented instructions as follows:

Contrary to ACP 1409.1, work on DCR's 507 and 500, Revision 1 was performed before all approvals were obtained.

Response

1. Corrective action taken and results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

All plant personnel involved in the initiation, approval, performance, and review of DCR's shall be reinstructed in the importance of adhering to the requirements set forth in ACP 1409.1.

3. Date when full compliance shall be achieved:

Corrective action shall be completed by November 15, 1976.

Infraction 2.d

Contrary to 10CFR50, Appendix B, Criterion V, some activities affecting quality were not accomplished in accordance with documented instructions as follows:

Contrary to ACP 1401.4, work was performed during the last refueling outage on five safety related snubbers in the main steam relief system without initiating the required Maintenance Action Requests (MAR's).

Response

1. Corrective action taken and results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

All plant personnel involved in initiating, approving, performing and reviewing work performed in the plant shall be reinstructed in the importance of adhering to the requirements set forth in ACP 1401.4.

3. Date when full compliance shall be achieved:

Corrective action shall be completed by November 15, 1976.

Infraction 3

Contrary to 10CFR50, Appendix B, Criterion IX, post modification testing to ensure that the design change worked as expected and that safety of operations was not reduced was not performed for changes in the torus water level alarm system, the new CRD water supply, or the new meters which monitor recirculation pump speed.

Response

1. Corrective action taken and results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

All plant supervisors shall be reinstructed in the importance of ensuring that post modification testing is performed, as applicable, when a design change is completed.

3. Date when full compliance shall be completed:

Corrective action shall be completed by November 15, 1976.

Infraction 4.a

Contrary to 10CFR50, Appendix B, Criterion VI, the licensee has failed to control the issuance of documents as indicated by:

Engineering's failure to ensure that as-built drawings are correct prior to their issuance.

Response

1. Corrective action taken and results achieved:

The documents associated with the closed DCR's have been corrected and the action documented. The documents associated with DCR's that have not been closed are being processed and will be correct prior to DCR closure.

2. Corrective action to be taken to avoid further noncompliance:

It shall be emphasized to Engineering personnel of the importance of document revision review prior to issuance.

3. Date when full compliance shall be achieved:

Corrective action shall be completed by November 15, 1976.

Infraction 4.b

Contrary to 10CFR50, Appendix B, Criterion VI, the licensee has failed to control the issuance of documents as indicated by:

Failure to ensure that the operating instruction for the MSIV-LCS was correct prior to use.

Response

1. Corrective action taken and results achieved:

The subject procedure has been reviewed and revised to correct the discrepancies noted during the inspection. The revision was approved on September 10, 1976.

2. Corrective action to be taken to avoid further noncompliance:

Plant supervisors shall be reinstructed in the importance of being completely familiar with the subject of a procedure prior to approving the procedure.

3. Date when full compliance shall be achieved:

Corrective action shall be completed by November 15, 1976.

Infraction 5

Contrary to 10CFR50, Appendix B, Criterion XV, the flanges used in the reactor head spray line modification (DCR No. 493) contained unacceptable indications of discontinuities, according to the NDT document supplied by the vendor.

Response

1. Corrective action taken and results achieved:

The supplier was contacted and it was determined that there was a paper mix-up which caused improper NDT results to be sent to DAEC. The correct results, which indicate satisfactory examination, have been received and have been incorporated in the DCR.

2. Corrective action to be taken to avoid further noncompliance:

All plant personnel involved in DCR review shall be reinstructed in the importance of ensuring that a DCR receives a complete and thorough review prior to releasing the package for performance of the work.

3. Date when full compliance shall be achieved:

Corrective action shall be completed by November 15, 1976.

Infraction 6.a

Contrary to Technical Specification 6.8.1.3, detailed written procedures covering actions to be taken to correct specific and foreseen potential malfunctions were not written for:

The new subsystem installed to supply water to the CRD's.

Response

1. Corrective action taken and the results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

The lack of modified procedures represents an undesirable situation from an operational point of view; however, these particular procedures are unrelated to nuclear safety and thus are not subject to the violation of Technical Specification paragraph 6.8.1.3.

3. Date when full compliance will be achieved:

Not applicable.



Infraction 6.b

Contrary to Technical Specification 6.8.1.3, detailed written procedures covering actions to be taken to correct specific and foreseen potential malfunctions were not written for:

The new MSIV-LC system.

Response

1. Corrective action taken and the results achieved:

Not applicable.

2. Corrective action to be taken to avoid further noncompliance:

Detailed written procedures covering required operator actions were written for the MSIV-LCS at the time of the NRC inspection. However, due to system design changes being made just prior to installation, the latest setpoints and trip points for some components were not incorporated into the Operating Instruction. Plant supervisory personnel shall be reinstructed to insure their review of new system procedures with ie: Engineering in order to have the latest information incorporated into the procedures.

3. Date when full compliance will be achieved:

The changes referred to in the inspection report paragraph 4.c(3) were incorporated into the procedures on September 9, 1976.

Deficiency

Contrary to Technical Specification 6.8.1.6, test procedure 83.3 used to pre-op the MSIV-LCS was incomplete in that a step was missing between steps 4 and 5, and the test was performed by departing from the procedure without the required reviews and approvals.

Response

1. Action taken and results achieved:

The engineer who performed the test was contacted and verified that he had departed from the procedure. A memo was issued and placed with the DCR documenting that the action had been performed.

2. Action to be taken to avoid further noncompliance:

In the future, contract engineers shall be instructed not to deviate from approved procedures without first obtaining the required reviews and approvals. In addition, changes to procedures shall receive better review prior to approval.

3. Date when full compliance shall be achieved:

Not applicable.

Deviation

Contrary to Amendment 13 to the FSAR, submitted on March 1973, the licensee failed to determine that with one blower in operation a minimum of 30 inches W.C. negative pressure would be maintained in the low pressure manifold of the MSIV-LCS and to ensure that the dilution damper was then locked in position.

Response

1. Corrective action taken and results achieved:

Not applicable.

2. Corrective action taken to avoid further noncompliance:

A procedure shall be issued and performed to correct the items in this deviation.

3. Date when full compliance shall be achieved:

The procedure shall be performed during the next convenient outage. A sincere effort will be made to ensure that this will be before the end of 1976.

Very truly yours,



J. A. Wallace  
Vice President-Generation

JAW/ELH/ar

c.c. Mr. D. Arnold  
Mr. G. Hunt  
Mr. E. Hammond  
Mr. L. Liu  
Mr. D. Wilson  
Mr. L. Root  
Mr. H. Rehrauer  
Mr. G. Cook  
Mr. R. Rinderman  
Mr. J. Newman