



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

APR 06 1978

Docket No. 50-331

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

Gentlemen:

This refers to the inspection conducted by Messrs. H. B. Kister and J. E. Menning of this office on March 6-9, 1978, of activities at the Duane Arnold Energy Center authorized by NRC Operating License No. DPR-49 and to the discussion of our findings with Mr. Ellery Hammond and members of his staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A. The inspection showed that you were aware of the noncompliance and are conducting a review of the records management system at DAEC to determine the steps necessary to ensure interim and long range corrective action is taken. Therefore, you are requested to submit to this office within twenty days your corrective actions and schedule when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty

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Iowa Electric Light and
Power Company

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days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-331/78-05

cc w/encls:

Mr. E. L. Hammond, Chief
Engineer

✓ Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

OFFICE▶	RIII <i>rek</i>	RIII	RIII <i>WJ</i>	RIII <i>adl</i>	RIII <i>CF</i>	
SURNAME▶	Kister/bk	Knop <i>rek</i>	Menning	Little	Fiorelli	
DATE▶	4/4/78					

Appendix A

NOTICE OF VIOLATION

Iowa Electric Light
and Power Company

Docket No. 50-331

Based on the inspection conducted on March 6-9, 1978, it appears that certain of your activities were in noncompliance with NRC requirements. The item listed below is an infraction.

Contrary to 10 CFR, Part 50, Appendix B, Criterion V and Iowa Electric Quality Assurance Directive (QAD) 1317.1, the records management system has not been fully implemented.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-331/78-05

Docket No. 50-331

License No. DPR-49

Licensee: Iowa Electric Light and Power Company
IE Towers
P. O. Box 351
Cedar Rapids, IA 52406

Facility name: Duane Arnold Energy Center

Inspection at: Duane Arnold Site, Palo, IA

Inspection conducted: March 6-9, 1978

Inspectors: *RC Knop for*
H. B. Kister

4/5/78

J. E. Menning
for J. E. Menning

4/5/78

Approved by: *RC Knop*
R. C. Knop, Chief
Reactor Projects Section 1

4/5/78

Inspection Summary

Inspection on March 6-9, 1978 (Report No. 50-331/78-05)

Areas Inspected: Routine, unannounced inspection of Licensee Procedures, Records Management, compliance with Safety Limits, Limiting Safety System Settings and Limiting Conditions for Operations, Licensee Event Reports, and IE Bulletin and Circular responses.

Results: Of the five areas inspected, one item of noncompliance was found in one area (failure to fully implement the records management system in accordance with the guidance of ANSI N45.2.9, as required by QAD 1317.1 (Paragraph 4, Details)).

DETAILS

1. Persons Contacted

Corporate Office

W. C. Jurgensen, Manager Corporate Services
J. R. Ellis, Records Supervisor

Site

*E. Hammond, Chief Engineer
*D. Mineck, Assistant Chief Engineer
*B. York, Operations Supervisor
G. Phillips, Administrative Supervisor
R. Rockhill, Mechanical Maintenance Supervisor
*J. Vinqvist, Electrical Maintenance Supervisor
*R. Rinderman, Quality Supervisor
D. Teply, Shift Supervisory Engineer
C. Vondra, Shift Supervisor Engineer
D. Gipson, Shift Supervisory Engineer
D. Kalivitinos, Training
*D. Wilson, Technical Engineer
*J. VanSickle, Engineering Assistant
P. Cotter, QA Engineer

The inspector also talked with and interviewed several other licensee employees, including members of the technical and operating staff.

2. Review of Licensee Event Reports

A review of reporting, corrective actions, licensee review and evaluation and compliance with regulatory requirements was conducted for the following reportable occurrences:

<u>Event Title</u>	<u>Event Date</u>	<u>Licensee Report Date</u>
<u>In Office Review</u>		
a. 50-331/77-88, LPCI Loop Select Logic PDIS failed to reset after test (30 day)	11-8-77	12-6-77
b. 50-331/77-89, SBGTS monthly surveillance missed (30 day)	11-28-77	12-6-77

<u>Event Title</u> <u>In Office Review</u>	<u>Event Date</u>	<u>Licensee Report Date</u>
c. 50-331/77-98, MSL tunnel hi ambient temperature indication power supply failed (30 day)	12-29-77	1-23-78
d. 50-331/78-05, MSL "B" (Turbine Bldg) Leak Det. System Temp Monitor tripped greater than T.S. (30 day)	1-3-78	2-2-78
e. 50-331/78-06, Hi DW Press. Switch tripped Hi during test (30 day)	1-11-78	2-2-78
f. 50-331/78-07, APRM gain adj. not performed prior to reaching 20% (30 day)	1-10-78	2-2-78
g. 50-331/78-08, Cont. Bldg "B" SBFU operated with excessive flow (30 day)	1-20-78	2-16-78
<u>Site Review</u>		
h. 50-331/77-08, Pipe support concrete anchor failures, update	1-31-77	1-20-78
i. 50-331/77-13, Pipe support concrete anchor failures (14 day)	2-20-77	3-3-77
j. 50-331/77-80, Incorrect calibration data for the diesel oil storage tank (update)	10-6-77	1-9-78

The licensee event reports reviewed in the office are considered closed. The inspector's onsite review of reports included discussions of each event with licensee representatives as required, examination of the report, and other documents related to the particular areas reviewed. Comments are as follows:

Item h - The inspector reviewed the supplemental report dated January 20, 1978 and noted that the corrective action included a torque test of a selected percentage of anchors previously checked to assure adequacy of design. The test will be done during the 1978 refueling outage.

The inspector reviewed the procedure package at the site provided by corporate engineering. No problems were identified. The licensee reaffirmed that the test will be conducted during the 78 refueling outage.

Item i. - This report is similar to 77-08. The design review has been completed and further corrective action is as noted in the above Licensee Event Report. No further concerns were identified.

Item j. - As requested during a previous inspection,^{1/} the report was resubmitted with the required information. No further concerns were identified.

During the review of the above licensee event reports the inspector noted that the licensee had identified and satisfactorily corrected three items related to Technical Specification Requirements.

3. Review of Procedures

The inspector reviewed selected areas of the licensee's program for controlling procedures. Areas included were review and approval of initial procedures, permanent and temporary revisions, updating of controlled copies, technical content of revisions, and revisions required as a result of changes to the Technical Specifications. Types of procedures reviewed included; Operating Instructions, Abnormal Procedures, Emergency Procedures, Maintenance Procedures, and Administrative Control Procedures.

Comments are as follows:

- a. The inspector noted that the licensee's commitment^{2/} to updating the plant operations manual had been completed. A review of selected procedures was conducted by the inspector and no problems were identified.
- b. The inspector reviewed several maintenance procedures that are associated with electrical breakers^{3/}. The review was related to a previous breaker problem.^{3/} Comments are as follows:

1/ IE Inspection Report No. 50-331/77-22 dtd 12/10/77.
2/ IELP ltr from J. A. Wallace to J. G. Keppler, dtd 2/4/78.
3/ LER 50-331/78-58.

- (1) GPE-001, which is a general maintenance procedure for 480 volt ACB's, only covers those manufactured by ITE, however, Allis Chalmers type are not included.
- (2) MP-6 which is a preventative maintenance procedure for 480 volt breakers, includes requirements for checking breaker and contact condition. It references Inspection procedure 1P 1E -01B1, which contains references to Allis Chalmers instruction books for the various recommended checks. The book, however, does not contain instructions for adjustment of the over current static tripping device but does reference an instruction book for functional testing of the breaker which DAEC does not have. The inspector questioned the licensee regarding the procedure that was used to eventually reset the overcurrent tripping device on breaker 1B-3401 which had tripped on overcurrent due to an incorrect setting.^{4/} The licensee stated that the original Circuit Breaker Test Record, which had been completed during construction, was used. The inspector examined the record and noted that the design setpoints were included and used as acceptance criteria. The new test record was also examined against the original and the values were essentially the same. The licensee further stated that they were planning to rewrite GPE-001 to include Allis Chalmers breakers and will also include instructions for setting the overcurrent static tripping device. This commitment is to be included in DAEC's response to the Safety Committee Audit findings and recommendations which were included in the Safety Committee Report SC-196 dated February 14, 1978.

No additional concerns were identified pending the inspector's review of DAEC's response.

- c. The inspector examined DAEC's new system for ensuring that amendments to the Technical Specifications are reviewed and necessary changes to plant procedures are initiated as required.

The system is implemented by ACP 1402.6, Technical Specification Change Review. The inspector noted that a Change Review Form had been initiated for all proposed Technical Specification amendments subsequent to approval and issue of the above ACP. No further concerns were identified.

4/ Ibid.

4. Review of Records Management

The inspector reviewed selected areas of the licensee's records management system which is implemented by Quality Assurance Directive (QAD) 1317.1 and Administrative Control Procedures (ACP) 1207.2, 1207.3, 1402.1, and 1402.5. Applicable requirements include, DAEC Technical Specification Section 6.10, and ANSI N45.2.9 draft - Rev. 0 which is referenced in WASH 1284 and 1309. Comments are as follows:

- a. The inspector noted that QAD 1317.1 Revision 1 had just been issued on February 15, 1978. The revision emphasizes Iowa Electric's commitment to ANSI N45.2.9. It was further noted that ACP 1402.1 Rev. 1 had not yet been updated to reflect QAD 1317.1 Rev. 1. The licensee provided the inspector with a draft copy of the proposed revision to 1402.1. The licensee stated that the revision would be issued the week of March 13. The inspector also noted that the date the plant attained commercial operation for record retention purposes is February 1975 in QAD 1317.1, however, ACP 1207.2 and 1402.5 paragraph 6.2 use December 1974. The licensee agreed to correct the conflict.
- b. In discussion with the licensee the inspector noted several additional problems in meeting the requirements of ANSI N45.2.9.
 - (1) Implementing procedures do not clearly address the Record Storage Facilities nor does it specify if the single storage facility or the satisfactory alternate of maintaining duplicate records is intended to be used. In either case the existing storage facilities do not entirely meet the requirements of Section 5.6 since originals of several lifetime and 5 year records are being maintained in the administrative offices without having been duplicated. The files are not afforded the equivalent protection of a NFPA Class A four hour minimum rated facility. Examples of the subject records include records of irradiated fuel inventory and fuel transfer records (MBA Transfer records), records of gaseous and liquid radioactive material released to the environment, and exposure records.
 - (2) Radiographs, which are single records and presently unable to be duplicated, are stored partially in the document room at the corporate office and partially in the old Bechtel Construction vault at the site neither

f which meet the minimum storage requirements for single records. In fact, the construction vault on site, is in poor condition with no humidity control or adequate fire protection. Dampness was evident in that the floor was wet and several packages of radiographs appear to have been subject to water damage. In this regard, the inspector requested that the licensee take prompt action to move the radiographs stored at the site and corporate office to a qualified facility. The licensee stated that plans were to move them to a bank vault.

- (3) During the inspection of the corporate office records management the licensee informed the inspector that all DAEC records at the corporate office except radiographs have been duplicated and copies are maintained in a bank vault. Records at the site, however, have not been fully duplicated as previously mentioned. The inspector was provided a draft copy of a records management study that had just been completed by the Manager of Corporate Services. The study substantiated most of the inspector's findings. The greatest need appears to be in the establishment of a centralized file with duplicating facilities which will permit adequate record control and provide an adequate storage environment.

- c. The inspector informed the licensee that a plan should be formulated and a schedule established for interim and long term corrective actions for establishment of a record storage system that complies with the guidance of ANSI N45.2.9. The interim actions should include completing the development of a Central File, identification of departmental record storage areas and establishment of appropriate controls over those records. Also, steps should be taken to provide proper storage for radiographs. Duplication of all necessary quality assurance records should also be accomplished as-soon-as possible.

The licensee was informed that the inspector recognized that corrective actions appeared to be in progress for correcting the above item of noncompliance, however, as mentioned above a schedule for completion needs to be established. The licensee acknowledged the inspector's comments.

5. Plant Operations

Plant operations were reviewed for compliance with Technical Specification requirements for safety limits, limiting safety system settings and limiting conditions for operation. The review included discussions with facility representatives; direct observation of plant activities; review of operating records and procedures; and examination of surveillance test records and selected recorder charts. No items of noncompliance were identified. Following are items that resulted from the review:

- a. Review of operating logs revealed inconsistency in the manner in which recirculation loop temperatures and reactor vessel dome and bottom head drain temperatures were logged prior to recirculation pump starts. These logging requirements are established by Technical Specification 4.6.A.4 and 4.6.A.5. A licensee representative stated that the inconsistency would be eliminated in the future by requiring these temperatures to be logged prior to a recirculation pump start in STP 42A001 (Daily and Shift Instrument Checks).
- b. During the review of control board lineups for the HPCI and core spray systems, the inspector noted four instances in which valve control switch positions referenced in the associated operating procedure were inconsistent with the actual labeling on the control switches. A licensee representative stated that appropriate procedure changes would be made to eliminate these inconsistencies.

6. Review of Inspection and Enforcement Bulletins and Circulars

- a. (Open) IEB-78-01 regarding GE Type CR120A relay Celcon contact arm retainers. The licensee stated that the new Valox type retainers have been ordered and a design change package is being prepared to replace the subject retainers during the current refueling outage.
- b. (Open) IEB-78-02 regarding unprotected terminal blocks. The inspector reviewed the licensee's response to the bulletin. This item will be reviewed again during a subsequent inspection.
- c. (Closed) IEC 77-10 regarding vacuum conditions in liquid process tanks. The inspector reviewed the circular with a member of the licensee's staff. The licensee summarized his review which concluded that a problem does not exist at DAEC since all applicable liquid process tanks have unisolable vents. No concerns were identified.

- d. (Open) IEC 77-12 regarding dropped fuel assemblies. The licensee stated that the review was complete. It was noted that a new double grapple had been installed for use during the current refueling. Additional inspections and appropriate corrective action will be accomplished prior to commencing refueling. This item will be reviewed again during a subsequent inspection.

7. Followup on Previous Noncompliance and OII's

- a. (Closed) Commitment to update the plant operations manual. (Refer to paragraph 3.a, Report Details)
- b. (Closed) Infraction 3, Inspection Report 50-331/76-26 dated January 13, 1977. (Refer to paragraph 3.c, Report Details)

8. Exit Interview

The inspectors conducted an Exit Interview with the licensee representatives (denoted in paragraph 1) on March 9, 1978. The inspectors summarized the scope and findings of the inspection. With regard to the item of noncompliance in the area of records management, the inspector stated that the inspection report forwarding letter will include a request for a schedule of the licensee's interim and long range corrective actions.