

AUG 4 1977

Docket No. 50-331

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

Gentlemen:

Thank you for your letter dated July 27, 1977, informing us of the steps you have taken to correct the noncompliance identified in our letter dated June 24, 1977. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Gaston Fiorelli, Chief
 Reactor Operations and
 Nuclear Support Branch

cc: Mr. E. L. Hammond,
 Chief Engineer
 Mr. J. A. Wallace, Vice
 President - Generation

cc w/ltr dtd 7/27/77:
 Central Files
 Reproduction Unit NRC 20b
 PDR
 Local PDR
 NSIC
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OFFICE	RIII	RIII	RIII	RIII	RIII	
SURNAME	Maura/jb	Brown	Little	Fiorelli	Kistor	
DATE	8/2/77					

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

July 27, 1977

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

RE: Duane Arnold Energy Center
SUBJECT: Response to Letter from Gaston
Fiorelli to Duane Arnold dated
June 24, 1977
FILE: A-102 Inspection Report 77-14

Dear Mr. Keppler:

This letter is in response to Mr. Fiorelli's letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on June 2 and 3, 1977. The following responses indicate the actions which have been or will be taken to correct the items of noncompliance identified in Mr. Fiorelli's letter.

Item 1. Infraction

Contrary to Technical Specification 3.7.D.1 and ACP 1401.4, at least five of the eight MSIV's were not verified to close within the required time after maintenance had been performed on the valves.

Response

1. Corrective action taken and the results achieved:

Surveillance Testing performed on June 4, 1977 verified satisfactory closing times for all MSIV's.

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

A comprehensive revision to the Maintenance Action Request (MAR) system is planned which will include adding a mechanism for scheduling post maintenance testing on safety related equipment. This mechanism will account for those situations in which testing cannot be accomplished immediately following completion of the maintenance due to plant conditions, equipment limitations, etc. This will allow the maintenance documentation to be processed while still providing scheduling of deferred testing.

JUL 29 1977

July 27, 1977

3. Date when full compliance will be achieved:

The revisions to the MAR system are scheduled to be completed by January 1, 1978.

Item 2. Infraction

Contrary to 10 CFR 50, Appendix B, Criterion V and ACP 1401.4 procedural control was not maintained within the MAR system.

Response

1. Corrective action taken and the results achieved:

N/A

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

The comprehensive revision to the MAR (Maintenance Action Request) system as described in Item 1 above, is intended to make the system more workable and more relevant to the requirements of 10 CFR 50 Appendix B, Criterion V. This should help reduce the potential for the deficiencies identified during the inspection.

3. Date when full compliance will be achieved:

The revisions are scheduled to be completed by January 1, 1978.

Item 3. Deficiency

Contrary to Technical Specification 6.11.2.a(4) the licensee failed to report two possible periods shorter than five seconds experienced on May 22 and 27, 1977, within the required time period.

Response

1. Corrective action taken and the results achieved:

The two possible instances of periods less than 5 seconds were reported in Licensee Event Reports 77-53 and 77-53A on June 29, 1977. These reports were submitted because the length of the periods could not definitely be determined and the possibility exists that the periods were less than 5 seconds.

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

Future events involving possible periods of less than 5 seconds will be more thoroughly reviewed to help ensure reporting requirements are satisfied. In addition, a review will be made of plant operating instructions to determine if changes could be made which would help avoid conditions conducive to the occurrence of short periods during low power operation.

Mr. James G. Keppler


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3. Date when full compliance will be achieved:

The review of plant operating instructions will be completed by September 1, 1977.

Very truly yours,


J. A. Wallace
Vice President-Generation

JAW/JVS/mg

cc: Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555