

JUL 25 1977

Docket No. 50-331

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

Gentlemen:

Thank you for your letter dated July 8, 1977, informing us of the steps you have taken to correct the noncompliance identified in our letter dated June 16, 1977. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

James G. Keppler
Director

cc: Ellery L. Hammond
Chief Engineer

✓ cc w/ltr dtd 7/8/77:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

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OFFICE	RIII	R111 <i>WAB</i>	RIII <i>WAB</i>	RIII	RIII	RIII
SURNAME	Maura/jb <i>jm</i>	Brown	Little	Fiorelli	Kister <i>RJF</i>	Keppler
DATE	7/22/77					

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

July 8, 1977

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

Re: Duane Arnold Energy Center
Subject: Response to Letter from James Keppler
to Duane Arnold dated June 16, 1977
File: A-102 Inspection Report 77-13

Dear Mr. Keppler:

This letter is in response to your letter concerning an inspection of activities at the Duane Arnold Energy Center conducted in February, March, April and June 1977. The following responses indicate the actions which have been or will be taken to correct the items of noncompliance identified in your letter.

Infraction A.3

Contrary to Technical Specification 6.8.1.6, STP 47A005 was not adhered to during the performance of some of the MSIV's "as found" leak rate tests in that the pressure decay method used and the flow regulator installed were not as described in the specific and general test procedures, respectively.

Response

1. Corrective action taken and results achieved: N/A
2. Corrective action taken to avoid further noncompliance:

Prior to seat leak rate testing the MSIV's during the 1978 refuel outage, the MSIV test procedure within STP 47A005 will be changed to allow the pressure decay method to be used if as found leakage is beyond the flow meter capacity. The local leak rate test procedure will be adhered to and equipment changes will be documented by use of document change forms.

JUL 11 1977

3. Date when full compliance will be achieved:

STP 47A005 will be revised by January 1, 1978. A letter will be transmitted to our consultant by August 1, 1977 advising them of the requirement for strict adherence to test procedures in the future.

Infraction A.4

Contrary to 10 CFR 50, Appendix B, Criterion XVII "Quality Assurance Records," some of the MSIV leak test records did not state all of the pertinent conditions under which the tests were run, and this lack of information affected the results of some of the inboard MSIV tests.

Response

1. Corrective action taken and results achieved: N/A

2. Corrective action taken to avoid further noncompliance:

All data taken in future MSIV seat leakage testing will be considered as formal data and as such will be recorded on the special data forms. All data taken during the recent MSIV seat leakage tests had all pertinent conditions noted on the test forms. Conditions during preparation of the MSIV test volume were not critical as the data was preliminary and not relevant to the test for leakage across the seat of the MSIV. Due to the misuse of this preliminary data, no written data will be taken while preparing the MSIV's for seat leakage testing. The lack of information on the preliminary testing had no effect on the required Technical Specification MSIV seat leakage tests.

3. Date when full compliance will be achieved: N/A

Deficiency 1

Contrary to Technical Specification 6.8.1.6, procedure STP 47A005 was not adhered to in that the flowmeter P-139 used in testing the "B" outboard MSIV was not calibrated for the 24 psig test condition prior to its use.

Response

1. Corrective action taken and results achieved: N/A

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

A letter will be sent to our consultant emphasizing that equipment calibration conditions must correspond to leak rate test conditions for which the equipment is to be used.

3. Date when full compliance will be achieved:

The letter to our consultant will be transmitted by August 1, 1977.

Deficiency 2

Contrary to Technical Specification 6.10.1.4, records of the Refueling Interlock Functional Test conducted on April 6, 1977, could not be located by the licensee on April 21, 1977, whereas they are required to be kept for five years.

Response

1. Corrective action taken and results achieved: N/A
2. Corrective action taken to avoid further noncompliance:

The misplacement of the subject test results apparently was a clerical error. The error is considered to be random in nature and current administrative procedures should be sufficient to avoid further instances of similar noncompliance. Therefore, additional corrective action is not deemed appropriate at this time.

3. Date when full compliance will be achieved: N/A

Also, as referenced in your letter, Mr. Hammond stated at the June 2, 1977 meeting that serious thought was being given to changing the MSIV testing procedure to insure that the outboard MSIV leakage paths do not effect the measured seat leakage data of the inboard MSIV's. One possible change may involve pressurizing the volume between the MSIV's, close off all leakage paths external to the test volume thru packing and MSIV-LCS valves and then test the inboard MSIV's for seat leakage.

Very truly yours,


J. A. Wallace
Vice President-Generation

JAW/DLW/mg

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