

JUL 22 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 letters dated June 28 and July 12, 1977,  
informing us of the steps you have taken to correct the  
noncompliance identified in our letter dated June 6, 1977.  
We will examine your corrective action during a future  
inspection.

Your cooperation with us is appreciated.

Sincerely,

James M. Allan, Chief  
Fuel Facility and  
Materials Safety Branch

cc: Ellery L. Hammond  
Chief Engineer

cc w/ltre dtd 6/28/77 &  
7/12/77:

- ✓ Central Files
- Reproduction Unit NRC 20b
- PDR
- Local PDR
- NSIC
- TRC

OFFICE	RIII <i>[Signature]</i>	RIII <i>[Signature]</i>	RIII <i>[Signature]</i>	RIII		
SURNAME	Gibson/jb	Fisher	Allan	Kister		
DATE	7/21/77					

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# IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office  
CEDAR RAPIDS, IOWA

JAMES A. WALLACE  
VICE PRESIDENT - GENERATION

June 28, 1977

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

RE: Duane Arnold Energy Center  
SUBJECT: Response to your letter to Duane Arnold  
dated June 6, 1977  
FILE: A-102 Inspection Report 77-10

Dear Mr. Keppler:

This letter is in response to your letter of June 6, 1977 concerning an inspection of activities at the Duane Arnold Energy Center conducted on May 2-5, 1977. The following responses indicate the actions which have been or will be taken to correct the infractions noted in your letter.

## INFRACTION 1

Contrary to Technical Specification B-3.3.1.C.5, the quarterly testing of the off-gas stack and reactor building vent stack gaseous monitors during 1976 did not adequately check the calibration of these monitors.

## RESPONSE

1. Corrective action taken and the results achieved:

Not Applicable

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

The quarterly surveillance test procedures for the offgas vent pipe and reactor building stack radiation monitors will be revised to require the results of each test be compared to control charts. The control charts have been developed using surveillance test data from May 1974 to May 1977.

3. Date when full compliance will be achieved:

The subject surveillance test procedures will be revised by July 15, 1977.

JUN 30 1977

## INFRACTION 2

Contrary to Technical Specification 4.7.B, required surveillance on the standby gas treatment system was not adequately performed in the following instances:

- a. The incorrect revision of STP 47B003 was used to perform and record the June 23, 1976 surveillance testing.
- b. An inoperable differential pressure gauge was used to demonstrate adequacy of the pressure drop across the combined high efficiency and charcoal filters (Train "B") during surveillance testing on May 5, 1976.
- c. Run-time records, required to comply with the surveillance testing requirements after 720 hours of system operation, were not maintained before May 1976.

## RESPONSE

1. Corrective action taken and the results achieved:

Item a. Not Applicable

Item b. The inoperable differential pressure gauge was replaced by May 5, 1977.

Item c. Not Applicable

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

Item a. Revision 4 to STP 47B003 was implemented on May 26, 1976 which was after the STP had been issued for performance. The normal procedure is to recall STP's which have had changes made after having been issued for performance but not yet completed. This was not done in this instance due to clerical oversight. The personnel involved are aware of this problem but since this was the first instance of trouble in this area no corrective action is planned.

Item b. DAEC Technical Specification 4.7.B.1.a requires testing of the pressure drop across the combined high efficiency and charcoal filters once per operating cycle. The purpose of this specification is to determine if any plugging has occurred in the high efficiency or charcoal filters. The surveillance test in question contains the recorded pressure drop across these filters. The gauge which was inoperable provided a pressure drop indication across the entire train and thus is not necessary for satisfying the requirements of this specification.

Item c. A run time log was initiated which accounts for all standby gas treatment system operating hours.

Mr. J. G. Keppler, Director  
June 28, 1977  
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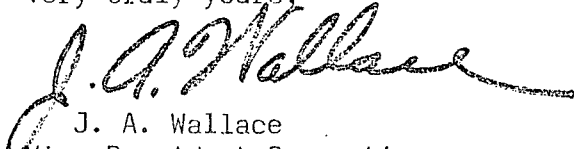
3. Date when full compliance will be achieved:

Item a. Not Applicable

Item b. Not Applicable

Item c. Full compliance was achieved in May 1976.

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

# IOWA ELECTRIC LIGHT AND POWER COMPANY

*General Office*  
CEDAR RAPIDS, IOWA

July 12, 1977

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: Further Response to your letter to  
Duane Arnold dated June 6, 1977  
File: A-102 Inspection Report 77-10

Dear Mr. Keppler:


This letter is in addition to our response letter of June 28, 1977 concerning an inspection of activities at the Duane Arnold Energy Center conducted on May 2-5, 1977. In addition to the information contained in the initial response, the following corrective action will be taken to avoid further noncompliance:

Infraction 2.b

Response

Surveillance Test Procedure 47B001 will be modified to require verification that the pressure drops recorded in Step 4.4 total less than 11 inches of water. This requirement will provide additional assurance that the pressure drop across the high efficiency particulate and charcoal filters does not exceed 11 inches of water and that Technical Specification 4.7.B.1.a is satisfied. This action will be completed by August 16, 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

JUL 15 1977