

MAY 23 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 May 12, 1977, informing us of the steps you have taken to correct the noncompliance identified in our letter dated April 22, 1977. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

R. F. Heishman, Chief
Reactor Construction and
Engineering Support Branch

cc: Mr. Lee Liu, Vice
President, Engineering
Mr. E. L. Hammond, Chief
Engineer

cc w/ltr dtd 5/12/77:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

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OFFICE	RIII	RIII	RIII	RIII		
SURNAME	Lee/lb ¹²	<i>[Signature]</i>	Heishman	Kister		
DATE	5/20/77					

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

May 12, 1977

IE-77-971

LEE LIU

VICE PRESIDENT - ENGINEERING

Mr. R. F. Heishman, Chief
Reactor Construction and Engineering Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Duane Arnold Energy Center
Subject: Response to Mr. Heishman's letter
to Mr. Arnold dated April 22, 1977
Ref: IE Inspection Report 050-331/77-06
File: A-107, Q-69, IR-77-06

Dear Mr. Heishman:

This letter is written in response to an Infraction presented in the referenced Inspection Report covering an inspection period of March 14-18, 23, 30, 31 and April 6-8, 1977 at the DAEC and IELP Corporate Headquarters. This Infraction dealt with two aspects of a vendor's Quality Assurance Manual/Program, namely (1) conditions adverse to quality and (2) responsibility and authority of individuals involved in safety related activities.

The corrective action taken by IELP and the vendor was based on the assumption that the Infraction in question was a violation of Criteria XVI and I, respectively, of Appendix B to 10 CFR 50.

Subsequent to receipt of the Inspection Report, the vendor prepared and issued two new procedures to his QA Manual that are identified as:

QA-18 "Procedural Nonconformances"
QA-17 "Responsibility for Quality Assurance Functions"

which were judged by the IELP QA Evaluator to be adequate to satisfy the concerns of the Infraction.

MAY 16 1977

Several other improvements were made in the vendor's QA Program during the period of 1976-1977 and we are confident that this vendor will continue to improve his fine program and operations.

Very truly yours,

for *sa looh*

Lee Liu
Vice President, Engineering

cc: D. Arnold
R. Lowenstein
J. Wallace
L. Root
G. Cook
E. Hammond



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

Docket No. 50-331

MAR 21 1977

Iowa Electric Light and Power
Company

ATTN: Mr. Duane Arnold
President

IE Towers
P.O. Box 351
Cedar Rapids, IA 52406

Gentlemen:

This refers to the inspection conducted by H. B. Kister of this office on March 10-11, 1977, 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. 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 under Enforcement Items in the Summary of Findings section of the enclosed inspection report. The inspection showed that action had been taken to correct the identified noncompliance and to prevent recurrence. Consequently, no reply to this noncompliance is required and we have no further questions regarding this matter at this time.

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 and the enclosed inspection report will be placed in the NRC's Public Document Room, except as follows. If this report contains information that you or your contractors believe to be proprietary, you must apply in writing to this

MAR 21 1977

office, within twenty 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

Enclosure: IE Inspection
Report No. 050-331/77-05

cc w/encl:
Mr. E. L. Hammond, Chief
Engineer
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

OFFICE >	RIII	RIII	RIII		
SURNAME >	Kister/jb	Knop RCK	Fiorelli		
DATE >	3/18/77				

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Operations Inspection

IE Inspection Report No. 050-331/77-05

Licensee: Iowa Electric Light and Power
Company
IE Towers
P.O. Box 357
Cedar Rapids, IA 52406

Duane Arnold Energy Center
Palo, IA

License No. DPR-49
Category: C

Type of Licensee: BWR (GE) 538 MWe

Type of Inspection: Routine, Unannounced

Dates of Inspection: March 10-11, 1977

Principal Inspector:


H. B. Kister

3-20-77
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: *NONE*

(Date)

Reviewed By: *RC Knop*
R. C. Knop, Chief
Reactor Projects Section 1

3-21-77
(Date)

SUMMARY OF FINDINGS

Inspection Summary

Inspection on March 10-11, 1977, (77-05): Review of plant operations, Licensee Event Reports, and refueling outage schedule. One item of non-compliance was identified regarding jumper and lifted lead control.

Enforcement Items

A. Violations

None.

B. Infractions

None.

C. Deficiencies

Contrary to 10 CFR 50, Appendix B, Criterion V and ACP 1404.6, the licensee:

1. Failed to properly complete a jumper and lifted lead control clearance form in accordance with ACP 1404.6, section 6.
2. Failed to conduct the monthly audit of the jumper and lifted lead log book in accordance with ACP 1404.6, Section 5.1.5 and 5.5.3. (Paragraph 2, Report Details)

Licensee Action on Previously Identified Enforcement Items

Not reviewed.

Other Significant Items

A. Systems and Components

None.

B. Facility Items (Plans and Procedures)

The reactor was shut down on March 12, 1977 for a five week refueling outage.

C. Managerial Items

None.

D. Deviations

None.

E. Status of Previously Reported Unresolved Items

None reviewed.

Management Interview

At the conclusion of the inspection, a management interview was conducted with Mr. Hammond and members of his staff. The following matters were discussed:

- A. The inspector summarized his review of plant operations and noted one deficiency related to maintaining and auditing the jumper and lifted lead log. (Paragraph 2, Report Details)
- B. The inspector discussed the progress of the Operating Manual updating program. The licensee stated that the subject review and updating effort was on schedule.
- C. The inspector summarized his review of Licensee Event reports. No significant problems were identified. (Paragraph 3, Report Details)
- D. The inspector stated that he had reviewed the design change package for updating electrical penetrations with the engineer in charge of conducting the work with regard to methods that were to be used for performing the work. (Paragraph 4, Report Details)
- E. The inspector commented on the upcoming refueling outage schedule. The inspector also discussed the secondary containment problem in the steam tunnel that occurred during the previous refueling outage.^{1/} The licensee stated that they were planning on maintaining strict access control to prevent recurrence.
- F. The inspector reminded the licensee regarding their commitments^{2/} to ensure that contract personnel are properly trained. The licensee acknowledged the inspectors comment.

^{1/} IE Inspection Report No. 050-331/76-05 dated March 29, 1977.

^{2/} IEL&P Letter from J. A. Wallace dated February 4, 1977.

REPORT DETAILS

1. Persons Contacted

- E. Hammond, Chief Engineer
- D. Mineck, Assistant Chief Engineer
- B. York, Operations Supervisor
- J. Gebert, Maintenance Superintendent
- J. Vinqvist, Electrical Maintenance Supervisor
- R. Hannen, Reactor and Plant Performance Engineer
- D. Tepley, Shift Supervising Engineer
- M. Hammer, Shift Supervisor Engineer
- C. Vondra, Shift Supervisor Engineer
- D. Wilson, Technical Engineer
- R. Rinderman, Quality Supervisor
- D. McGrath, Bechtel Engineer

2. Plant Operations

The inspector reviewed selected areas of plant operations. Included was a review of control room and supervisor logs, auxiliary operator logs, operating orders, jumper lifted lead control, operational problems, control room manning, hold off log (caution and tag out), and control room operations.

a. Review of Records

The inspector reviewed the following records:

- (1) Shift Supervisor's Log, February 22 through March 7, 1977.
- (2) Control Room Log, February 22 through March 7, 1977.
- (3) Auxiliary Operator Daily Log, March 2-7, 1977.
- (4) Jumper and Lifted Lead Log, all entries from December 1, 1976 to March 10, 1977.
- (5) Operating Orders 2-48, 49, 50, and 52.
- (6) Deviation Reports 76-190 through 77-50.
- (7) Results of Reactor Water Chemistry, Month of February 1977.

Comments are as follows:

The inspector noted that Clearance No. 09-77 dated January 13, 1977, which issued jumpers J-29 and J-118 for STP 42A006, was still outstanding. It was further noted that the subject jumpers had also been recorded as used in subsequent clearances. The shift supervisor conducted an immediate inventory and the jumpers were found in the storage location. Subsequently, the inspector discussed the Administrative Control Requirements (ACP 1404.6) for jumper and lifted lead clearance completion and auditing with the Operations Supervisor. When questioned regarding the monthly audit of the log, the licensee stated that the audit had not been conducted for January and February. The licensee further stated that, to ensure the monthly audit was conducted in the future, a surveillance procedure would be issued and incorporated into the surveillance program which would satisfy the above audit requirements. The inspector informed the licensee that the subject discrepancy would be considered an item of noncompliance. Subsequently, the licensee prepared and issued the new procedures. The inspector informed the licensee that the noncompliance would not require further response.

No further problems were identified as a result of the record review.

b. Control Room Operations

The inspector observed Control Room operations for portions of the day and evening shifts on March 10, and a portion of the night shift on March 11. The following was observed.

- (1) Control room manning was in accordance with Technical Specifications.
- (2) Selected monitoring instruments were functioning properly and selected control switches were positioned as required by the operating procedures.
- (3) Housekeeping was satisfactory and cleanliness of internal areas of selected control panels were found to be acceptable.
- (4) Control room operator response to lighted annunciators was satisfactory.

3. 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. 50-331/76-64, HPCi Stm Flow PDIS Trip Point Drifted Low (30 day)	11-1-76	12-8-76
b. 50-331/76-70, MCPR Operating Limit Exceeded (30 day)	10-24-76	11-23-76
c. 50-331/76-73, MCPR Operating Limit Exceeded (30 day)	10-29-76	11-24-76
d. 50-331/76-77, D.W. Hi Press. Inst. Drifted High (30 day)	11-8-76	12-3-76
e. 50-331/76-78, MSL Hi Flow Inst. Drifted High (30 day)	11-9-76	12-7-76
f. 50-331/76-85, RCIO Gland Seal Condensate Pump Failed to Start (30 day)	11-21-76	12-21-76
g. 50-331/76-86, "B" MSIV/LCS Subsystem Heater Failed to Reach Temp. (30 day)	11-22-76	12-22-76
h. 50-331/76-90, Torus Liquid Torus Liquid Temp. Trans- mitter Failed (30 day)	12-15-76	1-13-77
i. 50-331/76-92, "B" MSIV-LCS Heater did not Reach Req'd Temp. (30 day)	12-27-76	1-14-77
j. 50-331/77-01, Startup Report for 3rd Qtr 1976 Not Submitted (30 day)	1-4-77	1-14-77
k. 50-331/77-02, ADS Permis- sive Water Level Switch Drifted High (30 day)	1-5-77	2-3-77

1.	50-331/77-7, 24 Volt D.C. System "A" Trouble Annunciator Failed to Function (30 day)	1-24-77	1-14-77
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Site Review

m.	50-331/76-57, Torus Level Exceeded Max. Allowed Level (14 day)	9-9-76	9-16-76
n.	50-331/76-82, Cad System N ₂ Volume Not Maintained (30 day)	11-12-76	12-10-76
o.	50-331/76-87, D.G. 1G21 Annual Inspection Not Completed Within Rq'd Time (30 day)	11-2-76	12-8-76
p.	50-331/76-88, HPCi Stm Flow PDIS Set Point Drifted Low (30 day)	12-7-76	1-5-77
q.	50-331/76-89, HPCi System Isolated During Test Due to Incorrect Stm Flow Trip Set Point (14 day)	12-20-76	12-30-76
r.	50-331/77-3, Leak Detector Sys. Particulate Collector Fouled with Condensate (30 day)	1-7-77	2-1-77
s.	50-331/77-4, Leak Detector Sys. Particulate Collector Fouled with Condensate	1-9-77	2-1-77

The Licensee Event Reports reviewed in the office are considered closed. The inspector's review of reports, other than those closed out in the regional office, 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 m - The inspector noted that the recently installed torus level alarm system was operating properly. The inspector had no further comments.
- Item n - The inspector reviewed the revised STP 47A012, Rev. 5, dated December 13, 1976, and noted that the procedure now required that a sufficient volume of nitrogen be available prior to initiating the test. The inspector had no further comments.
- Item o - The inspector noted that the diesel generator annual inspection was included on the list of required outage surveillances. No further problems were identified.
- Item q - The inspector reviewed a memorandum issued on January 27, 1977, by the Chief Engineer to DAEC supervisors emphasizing the need for ensuring that post modification testing is being accomplished. The inspector had no further comments.
- Items r and s - The inspector reviewed the radwaste operator daily check sheet and verified that the instrument lines were being checked daily for condensate. The licensee stated that there was no further evidence of condensate collecting.

4. Electrical Penetration Rework

The inspector reviewed the licensee's^{3/4/} preparations for conducting rework of electrical penetrations^{3/4/} which have been authorized by Design Change 529, Revision 1. The work practices to be used were reviewed with the Bechtel engineer in charge of the work. The inspector reiterated his concerns with regard to protecting vital cable from damage, and maintenance of the proper degree of containment while working on the penetrations. The inspector stated that this area would be reviewed again later in the current outage.

- 3/ IEL&P letters from J. A. Wallace and L. Liu dated November 10, 1976 and February 28, 1977, respectively.
- 4/ IE Inspection Report No. 050-331/75-20 dated 12/23/75.