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 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331  
 AUTH. NAME AUTHOR AFFILIATION  
 ROTHERT, W. C. Iowa Electric Light & Power Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DAVIS, A. B. Region 3, Ofc of the Director

SUBJECT: Responds to NRC notice of violation in Insp Rept  
 50-331/87-26 on 870901-1019. Corrective actions: fabric  
 reinforced Buna-N diaphragm installed, personnel counseled &  
 procedures revised.

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Iowa Electric Light and Power Company

December 4, 1987  
NG-87-4398

Mr. A. Bert Davis  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Response to NRC Notice of Violation  
Transmitted with Inspection Report  
87-026


File: A-102, A-103

Dear Mr. Davis:

This letter is provided in response to the subject Notice of Violation concerning inspections of activities from September 1 through October 19, 1987 at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact our office.

Very truly yours,

  
William C. Rothert  
Manager, Nuclear Division

WCR/JCT/go

Attachment: Response to Notice of Violation  
Inspection Report 87-026

cc: U. S. NRC Document Control Desk (Original)  
L. Liu  
L. Root  
R. McGaughy  
A. Cappucci  
NRC Resident Inspector - DAEC  
Commitment Control

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Iowa Electric Light and Power Company  
Response to Notice of Violation  
Transmitted with Inspection Report 87025

NRC Item of Violation (Severity Level IV)

10 CFR Part 50, Appendix B, Criterion VIII states, in part: Measures shall be established to prevent the use of incorrect material, parts, and components.

Duane Arnold Energy Center, Administrative Control Procedure 1408.1 Revision 11, "Corrective Maintenance" dated February 18, 1987, states in Section 6.3.24 that materials and parts must be verified, to meet the required specifications for their intended use, by checking the Quality Part Report Tag or comparing the design specification with purchasing information.

Duane Arnold Energy Center, Administrative Control Procedure 1405.4 Revision 4, "Material Requests and Warehouse Issues" dated February 18, 1987, states in Section 5.2 that the Quality Level of material shall be consistent with the Quality Level of the Work Request unless the exception is fully documented by attaching an approved Material Request for the inconsistent Quality Level Material.

Contrary to the above, during the period July 10-14, 1987, the replacement diaphragm for the HPCI turbine lube oil pressure control valve was not verified to meet the required specifications by comparing the design specification (vendor manual) with purchasing information. No Quality Part Report Tag was present because the replacement diaphragm was a Quality Level IV part. In addition, the warehouse issued the replacement diaphragm even though the Quality Level (IV) was inconsistent with the Quality Level (I) Material Request. No exception was documented by attaching an approved Material Request. As a result, the measures established by the Administrative Control Procedures did not prevent the use of an incorrect part.

Response to Item of Violation

1. Corrective Action Taken and the Result Achieved.

Upon discovery of the failed diaphragm the HPCI system was immediately declared inoperable, on July 14, 1987.

As immediate corrective actions the correct Quality Level (I) fabric-reinforced Buna-N diaphragm as recommended by Terry Turbine and General Electric was obtained and installed on July 16, 1987. Following testing, the HPCI system was declared operable on July 16, 1987.

The importance of following applicable procedures and requirements was re-emphasized to the groups involved. Maintenance planning personnel were reminded in their weekly Hotsheet meeting (meetings held to discuss various plant activities and safe work practices) on September 25, 1987 that the computerized Material Management Information System (MMIS) can be used for information only during maintenance planning activities and controlled design documents contain the approved design specifications. Warehouse personnel were reminded that an approved Material Request must be filled out by maintenance personnel prior to them issuing parts with Quality Levels lower than that of the work request.

2. Corrective Actions to be Taken

- a. Administrative Control Procedure (ACP 1408.1), "Corrective Maintenance" will be revised to instruct maintenance planners that MMIS which was used during maintenance planning for the replacement of the HPCI diaphragm on July 10, 1987 can be used for information only as MMIS has not yet been approved as a controlled procurement tool. MMIS is currently being used at DAEC to optimize warehouse material stockage.

This revision will include a new subcomponent replacement evaluation form (Attachment 8 of ACP 1408.1) which must be completed whenever a subcomponent with a quality level lower than that of the component is used. This form requires the approval of the Maintenance Engineering Supervisor (or designee). This procedure revision including required training will be in effect by December 31, 1987.

- b. ACP 1405.4, "Material Request and Warehouse Issues" will be revised to reflect the revisions made to ACP 1408.1. This change will required that warehouse personnel verify that the required subcomponent replacement evaluation form has been completed prior to issuing parts with quality levels lower than that of the component or system. This procedure revision including required training will be in effect by January 31, 1988.
- c. ACP 1402.1, "Industry-Related Operating Experience Information Processing Procedure" will be revised to provide a checklist that will require that the vendor technical information receive a standardized review and distribution into the applicable vendor manual(s) and the MMIS database. This procedure revision including required training will be in effect by January 31, 1988.

3. Other Corrective Actions to Improve Control of Materials, Parts and Components Include:

a. Quality Assurance Enhancement Program

As part of the Quality Enhancement Program, which was initiated earlier this year, the Quality Assurance Manual chapters dealing with Procurement and Material Control have received preliminary reviews. The procedures that implement the procurement chapter are currently under review. The procedures that implement the material control chapter will be reviewed in early 1988. The reviewers have been instructed to identify any possible enhancements which can be made to address the specific problems raised in this Notice of Violation. An essential element for ensuring the success of the Quality Enhancement Program is the adequacy of the training conducted to familiarize personnel with the requirements of the enhanced procedures. Pursuant to this objective, the Iowa Electric Light and Power Company indoctrination and training program is scheduled for review and implementation of identified enhancements in the third quarter of 1988. It is expected that the planned actions will minimize the potential for a recurrence of the problem noted in this Notice of Violation.

b. The Procurement Engineering Group is currently responsible for reviewing original material procurement specifications and other technical design documents. The results of these reviews will be incorporated into MMIS in order to provide a controlled database of approved technical requirements for procurement. Starting in June 1988 material will be individually flagged in MMIS indicating to personnel whether a particular entry on MMIS can or cannot be used as a controlled database for spare parts ordering and receiving, and parts distribution.

c. Documents showing past industry related operating experiences will be re-reviewed to assure recommendations made concerning changes in equipment part numbers or material specifications have been included into DAEC vendor documents and warehouse spares. This effort will be completed by June 30, 1988.

Date of Full Compliance

Full compliance with respect to returning HPCI to service was achieved July 16, 1987 by replacing the defective part and proving HPCI to be operable.

Procedural improvements and training to be completed by January 31, 1988 will ensure compliance with 10 CFR Part 50, Appendix B, Criteria VIII.