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 DAVIS,A.B. Region 3, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-331/88-22.

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Iowa Electric Light and Power Company

February 23, 1989  
NG-89-0613

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 Notice of Violation Transmitted  
with Inspection Report 88-022

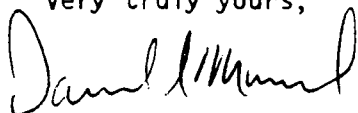
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Dear Mr. Davis:

This letter and attachment are provided in response to the subject Notice of Violation concerning certain activities at the Duane Arnold Energy Center.

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

Very truly yours,



Daniel L. Mineck  
Manager, Nuclear Division

DLM/LDM/go

Attachment: Response to Notice of Violation Transmitted  
with Inspection Report 88-022

cc: U. S. NRC Document Control Desk (Original)  
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L. Miller  
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Iowa Electric Light and Power Company  
Response to Notice of Violation  
Transmitted with Inspection Report 88-022

NRC NOTICE OF VIOLATION ITEM 1 (SEVERITY LEVEL IV)

10 CFR 50.59(a)(2) states, A proposed change, test, or experiment shall be deemed to involve an unreviewed safety question (i) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased; or (ii) if the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or (iii) if the margin of safety as defined in the basis for any Technical Specification is reduced. 10 CFR 50.59(b)(2) states, in part, that the licensee shall maintain records of changes in the facility . . . and that records must include a safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, the Safety Evaluation for the Design Change Notice No. 1422 approved for installation on June 22, 1988, did not provide the bases for the determination that the change did not involve an unreviewed safety question due to its failure to consider the effect of feedwater temperature on the soft seat material, and of localized leaching of halogens and sulfur from the soft seat on the stainless steel retaining ring and screws. The modified Safety Evaluation approved on November 25, 1988, also failed to address the issue of feedwater temperature above 423 degrees F.

RESPONSE TO NOTICE OF VIOLATION ITEM 1

1. Corrective Actions Taken and the Results Achieved:

A new safety evaluation has been prepared to address the suitability of the Parker Compound E692-75 for the selected application. This evaluation discusses the effects of temperature on the compound and on the overall performance of the check valves. The evaluation concludes that the primary pressure boundary will not be affected by the addition of the soft seating material. The soft seats are designed for low pressure seating. The manufacturer has stated that the material will not disintegrate at temperatures below 600 degrees F. Iowa Electric determined that, even if the material were to become completely compressed due to seating at elevated temperatures, the stellite seat would still prevent leakage.

2. Corrective Action That Will be Taken to Avoid Further Violations:

Iowa Electric is providing general 10 CFR 50.59 safety evaluation training as part of its continuing education program for the technical staff. The training program will be initiated in the second quarter of 1989 and completed by December 31, 1989. Thereafter, the continuing education program will provide annual 10 CFR 50.59 training.

In addition to the general training provided to the technical staff, special training will be provided by Iowa Electric's Design Engineering Department to the engineers responsible for the completion of safety evaluations. This training will be provided prior to December 31, 1989.

3. Date When Full Compliance Will be Achieved:

Full compliance was achieved with the completion of the revised safety evaluation.