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 MINECK, D.L. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DAVIS, A.B. Region 3, Ofc of the Director

SUBJECT: Responds to notice of violation noted in Insp Rept
 50-331/88-23.

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Iowa Electric Light and Power Company

March 23, 1989

NG-89-0910

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 88-023

File: A-102, A-103

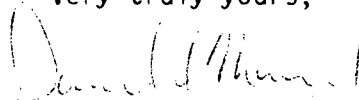
Dear Mr. Davis:

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

The corrective actions in the attachment were discussed with members of your staff at a meeting on March 9, 1989. The discussion at Region III also detailed additional solutions Iowa Electric is pursuing to address non-violation items noted in the text of Inspection Report 88-023.

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/VJC/go

Attachment: Response to Notice of Violation Transmitted
with Inspection Report 88-023

cc: U. S. NRC Document Control Desk (Original)
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRR)
NRC Resident Inspector - DAEC
V. Crew
Commitment Control No. 890035

JEOL

Iowa Electric Light and Power Company
Response to Notice of Violation
Transmitted with Inspection Report 88-023

NRC NOTICE OF VIOLATION 1 (SEVERITY LEVEL IV)

10 CFR 50 Appendix B, Criterion XVI, as implemented by section 14 of the Iowa Electric Quality Assurance Manual, "Corrective Action", requires that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the licensee failed to:

1. Take timely corrective action in the upgrading of 4.16 kV circuit breakers. The replacement of the RHR pump breakers Tuf-LOC sleeve bearings was completed two years after recommendation. As of November 1988, the licensee has not replaced the Tuf-LOC sleeve bearings on 44 breakers, including 19 that are safety-related.

RESPONSE TO ITEM 1 OF NOTICE OF VIOLATION

- a. Corrective Actions Taken and the Results Achieved:

We have developed a schedule to replace the Tuf-LOC sleeve bearings.

- b. Corrective Actions To Be Taken:

Replacement of the TUF-Loc sleeve bearings on the remaining forty-four breakers will be completed by the next refuel outage (1990). The safety-related breakers will be completed first.

- c. Date When Full Compliance Will be Achieved:

The replacement of the TUF-Loc sleeve bearing will be completed by startup from the next refuel outage (1990), as discussed at Region III on March 9, 1989.

2. Perform a root-cause analysis in a timely manner for a thermal overload problem on the EDG jacket cooling pump motors. The problem was documented in Engineering Work Request 87-196, dated August 28, 1987; however, the root cause analysis was completed in March 1988.

RESPONSE TO ITEM 2 OF NOTICE OF VIOLATION

a. Corrective Actions Taken and the Results Achieved:

We have issued a maintenance instruction which is now used whenever thermal overload relays are changed. Data needed for an engineering evaluation is now assembled as part of the maintenance process. The evaluation must be completed before the maintenance action can be closed.

b. Corrective Actions to Be Taken:

No further corrective actions are required.

c. Date When Full Compliance Will be Achieved:

Full compliance was achieved with the establishment of directives in the form of a maintenance instruction to assure timely review and action. This was completed October 21, 1988.

3. Provide timely corrective action for the refurbishment of the Reactor Water Level Switches. A history of problems with the switches was documented in 11 Deviation Reports from May 1985 through December 1987. Refurbishment was recommended in July 1986; however, the switches were not refurbished until the 1988 refueling outage.

RESPONSE TO ITEM 3 OF NOTICE OF VIOLATION

a. Corrective Actions Taken and the Results Achieved:

We are now using the Preventive Maintenance Program for refurbishment of the Reactor Water Level Switches. This task has been included in the program and the parts have been ordered. This will ensure availability of parts for the next instrumentation rebuild.

The preventive maintenance referred to above will serve as the needed control mechanism.

b. Corrective Actions To Be Taken:

No further corrective actions are required.

c. Date When Full Compliance Will be Achieved:

Full compliance was achieved by the inclusion of the Yarway reactor water level switch refurbishment task into the preventive maintenance program on February 21, 1989.

4. Provide corrective action to address the agitation of instruments that resulted in the masking of instrument problems and potential common mode failure.

RESPONSE TO NOTICE OF VIOLATION ITEM 4

a. Corrective Actions Taken and the Results Achieved:

We emphasized to our maintenance workers at a meeting on February 17, 1989 that the practice of agitating instruments is unacceptable. Furthermore, the continuing training program for maintenance employees will now reiterate that the agitation of instruments is unacceptable.

b. Corrective Actions To Be Taken:

No further actions are planned.

c. Date When Full Compliance Will be Achieved:

Full compliance was achieved on February 17, 1989 when the new direction on instrument agitation was provided to the maintenance workers.

5. Provide timely corrective action for the welding of the retaining nut of globe valves manufactured by Anchor/Darling. An engineering evaluation, dated July 19, 1985, determined that tack welding would prevent disc-stem separation that had already been experienced on one RHR valve. Only two of 11 affected valves have had the corrective action implemented.

RESPONSE TO ITEM 5 OF NOTICE OF VIOLATION

a. Corrective Actions Taken and the Results Achieved:

A July 19, 1985 Engineering Work Request was generated to consider welding the retaining nut of the remaining 9 affected globe valves manufactured by Anchor/Darling. An engineering evaluation of those remaining affected valves was completed on February 13, 1989 after discussion with the vendor. It was determined that disassembling the 9 globe valves for the sole purpose specified in the Engineering Work Request (EWR 85-203) was not warranted (the one valve failure experienced was due to excessive throttling). The disc nut on the remaining 9 valves will be tack welded when they are open to permit other work. The Maintenance Action Requests for this work have been initiated.

b. Corrective Actions To Be Taken:

We will reduce the backlog of EWR's with safety impact to a level that allows for timely corrective action.

There are approximately 900 open EWRs, with about half of these involving document updates, these will be completed by December 1989.

The backlog also includes approximately 250 requested engineering studies. These engineering studies will be scoped and prioritized by December 1989.

The approximately 200 remaining Engineering Work Requests are being prioritized by the responsible System Engineer and the EWR Committee and those with a safety impact will be closed in a timely manner.

c. Date When Full Compliance Will be Achieved:

We have taken the steps necessary to provide for timely corrective action. The evaluation completed February 13, 1989 confirms full compliance.

6. Provide timely corrective action for the modification of Size 2 Limitorque MOV actuators as recommended in a Limitorque Corporation letter dated August 13, 1985. Seven valves required the modification to prevent the possibility of a worm shaft gear failure. There was no objective evidence that the modification was ever issued to the field.

RESPONSE TO ITEM 6 OF NOTICE OF VIOLATION

a. Corrective Actions Taken and the Results Achieved:

On February 25, 1989 we evaluated Engineering Work Request 85-293 which dealt with the potential for failure of worm shaft gears on seven valves. Two valves had been modified in accordance with the vendor's recommendation during the 1988 refuel outage. Five valves remain to be modified. Maintenance Action Requests have been initiated for these modifications which will be completed during the next refuel outage (1990).

b. Corrective Actions To Be Taken:

We will reduce the backlog of EWR's with safety impact to a level that allows for timely corrective action.

There are a total of approximately 900 EWRs of which about half are document updates. These updates will be completed by December 1989.

The backlogged Engineering Work Requests consist of approximately 250 requested engineering studies. The engineering studies will be scoped, prioritized, and dispositioned by December 1989.

The approximately 200 remaining Engineering Work Requests are being prioritized by the responsible System Engineer and the EWR Committee. Those EWR's that have a safety impact will be correctly prioritized and worked in a timely manner.

c. Date When Full Compliance Will be Achieved:

We have taken the steps necessary to provide for timely corrective action. The evaluation completed February 25, 1989 confirms full compliance.

7. Provide timely root-cause analysis to determine corrective action for the malfunction of the microswitches for Yarway instruments. The malfunction was reported in Deviation Report 87-921, issued December 29, 1987, and had not been evaluated at the time of this inspection.

RESPONSE TO ITEM 7 OF NOTICE OF VIOLATION

- a. Corrective Actions Taken and the Results Achieved:

We completed the evaluation of Deviation Report 87-921 on February 8, 1989. The root cause was determined to be inadequate preventive maintenance which may have contributed to faster microswitch wearout, and inadequate compensatory measures for microswitch performance characteristics. The Preventive Maintenance mentioned in response to item 3 includes actions which will ensure the operability of the level switches.

- b. Corrective Actions To Be Taken:

We have revised the Deviation Report form to include the assignment of priority for completion by the Operations and Technical Support departments. The supporting procedure is being revised and will be implemented by May 1, 1989. This procedural change will help to assign proper evaluation priority to each deviation.

- c. Date When Full Compliance Will be Achieved:

Full compliance was confirmed when DR 87-921 was formally evaluated on February 8, 1989.

8. Failure to take timely corrective action to resolve discrepancies identified in 1984-1986 during an Electrical Distribution Information Systems review. Some of these discrepancies could have an adverse effect on plant operations.

RESPONSE TO ITEM 8 OF NOTICE OF VIOLATION

- a. Corrective Actions Taken and the Results Achieved:

The Electrical Distribution Information System (EDIS) walkdown documented discrepancies with tags or engineering work requests.

We evaluated and cleared the only remaining EDIS tag on February 6, 1989. The operational discrepancies noted on this tag were resolved.

- b. Corrective Actions To Be Taken:

The 15 open EDIS engineering work requests have been evaluated and discrepancies will be resolved by December 1989. Twelve of these 15 open EDIS EWRs were design document changes.

c. Date When Full Compliance Will be Achieved:

EDIS inspection discrepancies will be resolved by December 1989.