

Appendix

NOTICE OF VIOLATION

Iowa Electric Light and Power Company

Docket No. 50-331

As a result of the inspection conducted on July 23 through September 16, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions (10 CFR Part 2, Appendix C), the following violation was identified:

- 1.a. Technical Specifications, paragraph 3.13.C.2.a, requires a fire watch to be established to ensure that the High Pressure Coolant Injection (HPCI) System room is checked hourly when the deluge system is inoperable and the HPCI system is required to be operable.

Contrary to the above, from July 18 to July 21, 1985, a fire watch was not established, the HPCI system room was not checked hourly, the deluge system was isolated and the reactor was being started from cold shutdown (a condition in which the HPCI system is required to be operable).

- b. Technical Specifications paragraph 4.3.E requires that with core thermal power greater than the limit specified in Figure 3.3-1 and total core flow less than 45% of rated, baseline Average Power Range Monitor (APRM) and Local Power Range Monitor (LPRM) neutron flux noise levels be established within two hours if not previously established since the last core refueling.

Contrary to the above, on August 2, 1985, the plant entered a region of operation in which core power was greater than 80% (which is greater than the limit specified in Figure 3.3-1) and total core flow was less than 45% of rated. Baseline APRM and LPRM neutron flux noise levels were not established during the approximately seven hours of operation in this region. Baseline APRM and LPRM values had not previously been established since the last core refueling.

Collectively, the above are a Severity Level IV violation.

2. Technical Specifications paragraph 3.1.A and Table 3.1-1 require a minimum of two Average Power Range Monitor (APRM) downscale trip functions per trip system.

Contrary to the above, between July 23 and July 31, 1985, APRM "A" was bypassed, which removed the APRM "A" downscale trip function and Intermediate Range Monitor (IRM) "C" was bypassed, which removed the APRM "C" downscale trip function. This left only one downscale trip function (APRM "E") for trip system "A".

This is a Severity Level IV violation.

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The inspection showed that action had been taken to correct the identified violations and to prevent recurrence. Consequently, no reply to these violations is required and we have no further questions regarding this matter.

OCT 07 1985

Dated


N. J. Chrissotimos
Reactor Projects Branch 2