

Iowa Electric Light and Power Company

May 16, 1985  
NG-85-2312

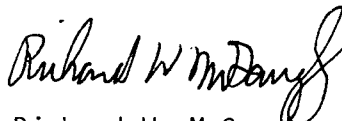
Mr. James G. Keppler  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No. 50-331  
Op. License DPR-49  
Response to NRC Inspection Report (85-01)

Dear Mr. Keppler:

This letter is provided in response to the subject inspection of activities at the Duane Arnold Energy Center on January 21-25 and March 25-28, 1985. Attachment 1 provides our response in accordance with your request.

Very truly yours,



Richard W. McGaughey  
Manager, Nuclear Division

RWM/JCS/kp

Attachment: Response to IR 85-01

cc: J. Smith  
L. Liu  
S. Tuthill  
M. Thadani  
NRC Resident Inspector  
Commitment Control #850089  
File A-102, NRC-4

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Response to IR 85-01

Attachment 1

NRC Item of Violation (Severity V)

10 CFR 50, Appendix B, Criterion XI, as implemented by Iowa Electric Light and Power Company "Quality Assurance Manual" (QAM), requires that adequate test instrumentation is available and used. Further, QAM, Chapter 7, requires the controlling of measuring and test equipment (MTE) within the scope of surveillance test activities.

Contrary to the above, the range and accuracy of the MTE used in surveillance tests are not controlled within the body of the surveillance procedures. MTE needs to be controlled to ensure testing of systems, and components will meet their acceptance limits.

Response to Item of Violation

1. Corrective Action Taken and the Results Achieved

While performing a quarterly calibration (Reactor High Pressure (RPS) Instrument Functional Test/Calibration) 41A001 on 11/15/84 and 1/14/85, a pressure gauge manufactured by Perma Cal was used for testing/calibration of pressure switches. On 11/15/84, the gauge used (Perma Cal) had a range of 0 to 1500 psig with an accuracy of +/-0.25% (+/-3.75 psig). On 1/14/85, the gauge utilized (Perma Cal) had a range of 0 to 2000 psig with an accuracy of +/-0.25% (+/-5.00 psig).

During the performance of STP 41A001, the instrument technician is required to test and calibrate pressure switches which trip at 1049.2 and 1061 psig respectively. The technician, by procedure, is required to and did conservatively leave the switches within +0 to -12 psig to ensure the trip functions will occur within the +/-12 psig instrument tolerance band. The accuracy of the gauges used in the STP were adequately within these tolerances to provide assurance of proper instrument response. Furthermore, the setpoints measured fell within the midranges of the gauges used.

Response to Item of Violation (Cont)

Our current practice is to rely upon technicians to ensure the test instrumentation is in calibration and meets the scale requirement for the pressure switch under test. Test instruments, in turn, are selected and utilized in safety-related applications only when their accuracy is acceptable for safety-related applications. The NRC's recommendations to specify test instrument range and accuracy within the surveillance test procedure will be implemented to improve on our current approach.

2. Corrective Action to be Taken to Avoid Further Noncompliance

Surveillance Test Procedures that utilize pressure measuring and test gages will be modified to specify appropriate range and accuracy.

3. Date When Full Compliance Will be Achieved

Completion of surveillance test procedure revisions identified in Item 2 is anticipated to be completed in August, 1985.

NRC Item of Violation (Severity V)

10 CFR 50, Appendix B, Criterion XII, as implemented by Iowa Electric Light and Power Company "Quality Assurance Manual" (QAM), requires measuring and testing devices used in activities affecting quality are properly controlled. Further, QAM, Chapter 11, requires a use history evaluation be performed on measuring and test equipment found out of calibration.

Contrary to the above, three pieces of measuring and test equipment were found out of calibration and there was no use history evaluation documented on their data sheets. The use history evaluations were completed following identification by the NRC inspector.

Response to Item of Violation

1. Corrective Action Taken and the Results Achieved

The following instruments were found out-of-calibration with no documented use histories:

- (1) Ashcroft duragauge, Inst. No. P-267, date 3/26/83
- (2) Marshalltown gauge, Inst. No. P-270, dated 11/08/84
- (3) Perma Cal gauge, Inst. No. P-242, date 6/06/84

Response to Item of Violation (Cont)

Administrative Control Procedures (ACP) 1408.8, Section 5.6 states, "Previous calibrations made with measuring and test equipment found to be out-of-tolerance shall be evaluated to determine the acceptability of the item's calibration status". Section 6.5.3 specifies, "An evaluation performed to determine the acceptability of the calibration status of instruments previously checked to the uncalibrated equipment". Section 4.2 states, "The Responsible Maintenance Supervisor shall implement the measuring and testing equipment calibration program for the Maintenance Department. This includes equipment identification, performing calibrations, resolutions of calibration discrepancies, and approval of calibration results".

The identified use histories have been completed. Further, use histories have been reviewed to ensure any other discrepancies have been resolved. Communications and administrative controls have been improved between instrumentation technicians and supervisory personnel to ensure use histories are identified and performed in a timely manner.

2. Corrective Action to be Taken to Avoid Further Noncompliance

A Quality Assurance audit of the program effectiveness in use histories will be performed to ensure adequacy of corrective action and continued adequacy of use histories.

As detailed above, administrative procedures are already in place to perform use histories on out-of-calibration measuring and testing equipment. The responsible Maintenance Supervisor has incorporated internal procedures to improve communications in this area.

3. Date When Full Compliance will be Achieved

As stated above, the use histories were completed immediately upon discovery, thereby achieving full compliance. QA review will provide a mechanism to identify and correct any further discrepancies in this area.