

Iowa Electric Light and Power Company

August 21, 1985

NG-85-3958

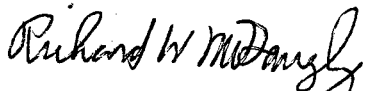
Mr. James G. Keppler  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No. 50-331  
Op. License DPR-49  
Response to NRC Inspection Report 85-11

Dear Mr. Keppler:

This letter is provided in response to the subject inspection of Duane Arnold Energy Center activities on April 23 through July 1, 1985. Attachment A provides our response in accordance with your request.

Very truly yours,



Richard W. McGaughy  
Manager, Nuclear Division

RWM/KSP/kp

Attachments: Response to IR 85-11

cc: K. Putnam  
L. Liu  
S. Tuthill  
M. Thadani  
NRC Resident Inspector  
File A-102, NRC-4

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Q PDR

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## Response to IR 85-11

## Attachment A

NRC Item of Violation (Severity V)

10 CFR Part 50, Appendix B, Criteria V, as implemented in the Duane Arnold Energy Center updated Final Safety Analysis Report, Revision 2, dated May 17, 1984, paragraph 17.2.5, "Instructions, Procedures, and Drawings," requires that "Once instructions, procedures and drawings have been approved and issued for use, the activities will be performed in accordance with the documents."

Contrary to the above, on May 2, 1985, while observing weld overlay activities the inspector identified that tool and material logs were not being maintained as required by General Electric Procedure No. GEDA-INS-001, "Cleanliness Control Procedure," and Iowa Electric Instruction Tool-1, Revision 0, "Tools Use Instruction for Recirculation System Pipe Repair Project Weld Overlays" (331/85011-01).

Response to Item of Violation

## 1. Corrective Action Taken and the Results Achieved

On May 2, 1985, immediately following the identification of the failure to maintain adequate tool and material logs, Iowa Electric Project Management took prompt action to ensure that the involved contractor immediately commenced 100% compliance with the procedure. In addition, the tools and materials at the Repair Control Center and in use were promptly reinventoried and it was confirmed that only appropriate tools and materials were available for use on the recirculation piping repair project. It should further be noted that no systems were open in association with the recirculation piping repair project thus minimizing the need for tool accounting as there was no potential for introduction of foreign objects into the recirculation system.

The contract personnel involved in the project were given explicit direction regarding the importance of procedural compliance and the proper implementation of the tool and material logs required by the procedures.

In addition to the above noted immediate corrective actions, the procedures involved were subsequently reviewed and revised to more specifically address the precautions needed relating specifically to the recirculation piping repair work in progress.

2. Corrective Actions to be Taken to Avoid Further Noncompliance

Corrective actions have been completed as discussed in Item 1 above.

3. Date Full Compliance will be Achieved

Full compliance was achieved on May 2, 1985 when the immediate corrective actions noted in Item 1 were instituted.

Appendix

NOTICE OF VIOLATION

Iowa Electric Light and Power Company  
Duane Arnold Energy Center

Docket No. 50-331  
License No. DPR-49

As a result of the inspection conducted on April 23 through July 1, 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:

10 CFR Part 50, Appendix B, Criteria V, as implemented in the Duane Arnold Energy Center updated Final Safety Analysis Report, Revision 2, dated May 17, 1984, paragraph 17.2.5, "Instructions, Procedures and Drawings," requires that "Once instructions, procedures and drawings have been approved and issued for use, the activities will be performed in accordance with the documents."

Contrary to the above, on May 2, 1985, while observing weld overlay activities the inspector identified that tool and material logs were not being maintained as required by General Electric Procedure No. GEDA-INS-001, "Cleanliness Control Procedure," and Iowa Electric Instruction Tool-1, Revision 0, "Tools Use Instruction for Recirculation System Pipe Repair Project Weld Overlays" (331/85011-01).

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JUL 26 1985

Dated



J. J. Harrison, Chief  
Engineering Branch

(Excerpt from IR 85-11)

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-331/85011(DRS)

Docket No. 50-331

License No. DPR-49

Licensee: Iowa Electric Light and Power Company  
Security Building, P.O. Box 357  
Cedar Rapids, IA 52406

Facility Name: Duane Arnold Energy Center

Inspection At: Duane Arnold Site, Palo, IA

Inspection Conducted: April 23, 29-30, May 1-3, 13-17,  
June 11-13, 26-30, and July 1, 1985

Inspector *D. H. Danielson*  
for W. J. Key

7/25/85  
Date

Approved By: *D. H. Danielson*  
D. H. Danielson, Chief  
Materials and Processes Section

7/25/85  
Date

Inspection Summary

Inspection on April 23, 29-30, May 1-3, 13-17, June 11-13, 26-30, and July 1, 1985 (Report No. 50-331/85011(DRS))

Areas Inspected: Unannounced, special inspection to review activities related to Inservice Inspection of piping welds, ultrasonic examinations conducted in response to Generic Letter 84-11, hydrostatic testing of the reactor pressure vessel and Class 1 and 2 piping systems, and HPCI Terry Turbine problems. This inspection involved a total of 124 inspector-hours onsite by one NRC inspector.

Results: Of the areas examined, one violation was identified (failure to follow tool and material control procedures - Paragraph 3.f).

(Excerpt from IR 85-11)

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2pp.

(2) Welder Certifications

<u>Name</u>	<u>Symbol</u>
R. Herrin	GEDA-1
G. Netolicky	GEDA-3
J. Hobart	GEDA-4
G. Landrus	GEDA-5
R. Demianiuk	GEDA-6
G. Ban	GEDA-7
D. Shakespear	GEDA-8

d. Material

The following material certifications for weld wire and liquid penetrant materials were reviewed by the inspector.

- Weld Wire ER308L, Heat No. P0564-lot No. 1397
- Liquid Penetrant Material

Cleaner - SKC-NF/ZC7B, Batch No. 85C039  
Penetrant - SKL-HF/S, Batch No. 82M030  
Developer - SKD-NF/ZP-9B, Batch No. 850015

e. Training

The licensee built mockups of the RRA-J4/J4A, RRD-J7, and RHB-J1 weld joints with access restrictions as found in the drywell. These mockups were placed on the turbine deck. All welders were trained on these mockups prior to performing any production welds. The welds were examined for defects and ferrite content (the same as production welds) and documented on travelers.

f. Observation of Activities

The inspector witnessed the training and qualification of welders on mockups of the J4/J4A, J1, and J7 welds and noted that training was performed under conditions as are found in the drywell, and documented on travelers. Automatic welding equipment was setup outside the drywell at the GE Control Center, monitored on TV camera, and controlled from the welding console. On May 2, 1985, while observing welding activities on the J4/J4A welds the inspector noted that a tool and materials log was not being maintained at the GE Control Center. This is contrary to requirements contained in GE Procedure No. GEDA-INS-001, "Cleanliness Control Procedure," and IE Instruction Tool-1, Revision 0, "Tools Use Instruction for Recirculation System Pipe Repair Project Weld Overlays," and is a violation of 10 CFR 50, Appendix B, Criterion V (331/85011-01).

(Excerpt from IR 85-11)