

Iowa Electric Light and Power Company

November 15, 1985
NG-85-4860

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 85-025

Dear Mr. Keppler:

This letter is submitted in response to NRC Inspection Report 85-025 dated October 9, 1985. Attachment 1 to this letter contains our response in accordance with your letter. Our one week delay in submitting this response was discussed with the Duane Arnold Energy Center Senior Resident Inspector, Mr. J. Wiebe.

Very truly yours,

R. W. McGaughy

Richard W. McGaughy
Manager, Nuclear Division

RWM/WJM/kp

Attachment:

cc: W. Miller
L. Liu
S. Tuthill
M. Thadani
NRC Resident Inspector
Commitment Control: 85-0304

File A-102, NRC-4

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Response to NRC Inspection Report 85-025

Attachment 1

NRC Item 1

DAEC Technical Specification 6.8.1 states, in part, that written procedures shall be prepared, approved, implemented, and maintained concerning normal startup, surveillance, and testing activities.

- a. Surveillance Test Procedure STP-42A001, "Daily and Shift Instrument Checks," Appendix J, requires a surveillance to be completed once every 8 hours to determine if a limiting control rod pattern exists.

Contrary to the above, in a number of surveillances performed between July 20 and August 15, 1985, the licensee exceeded the surveillance frequency and failed to properly complete Appendix J (331/85025-01a).

- b. Surveillance Test Procedure STP-41A015, "LPRM Instrument Calibration," requires an APRM (Average Power Range Monitor) calibration to be performed after the LPRMs (Local Power Range Monitors) are calibrated (in accordance with STP-42F007).

Contrary to the above, on July 27, 1985, the licensee failed to calibrate the APRMs subsequent to a LPRM calibration (33/85025-01b).

This is a Severity Level V violation (Supplement 1).

Response to Item 1a

Corrective Action Taken

DAEC Technical Specification 6.8.1 requires that the specified procedures that involve nuclear safety be prepared, approved, and adhered to. In the case of STP-42A001, the licensee procedurally required Operations personnel to log data on an 8 hour frequency while in power operation in recognition of Technical Specification 4.12.C. Technical Specification 4.12.C requires that Minimum Critical Power Ratio (MCPR) be determined at least once per 12 hours during operation with a limiting control rod pattern as a surveillance frequency. Technical Specification 1.0-26, Surveillance Frequency, requires surveillance tests to be performed with specified intervals and states that these intervals may be adjusted plus or minus 25%.

In recognition of a Technical Specification requirement to obtain MCPR data under certain circumstances (i.e., limiting control rod pattern) we established requirements which were intended conservatively to require this to be done and separately documented as part of our once per shift operator surveillance during reactor power operations. In recognition of the fact that Technical Specifications require this activity on a twelve hour frequency with time between surveillances not to exceed 15 hours, we selected the shiftly operator procedure and specified this activity on an 8 hour frequency within the body of the procedure to ensure Technical Specification compliance. In addition to STP 42A001, Licensee personnel obtain MCPR's (and other core data) hourly. The printout of MCPR's is maintained as a plant record.

The STP surveillance has not always been performed at 8 hour intervals although it is performed shiftly. As noted by the NRC, at no time was the maximum surveillance interval specification in Technical Specifications exceeded. A procedure revision has been initiated to more clearly reflect the intent of the shiftly requirements. Further, completed Operations surveillance procedure review by senior reactor operator licensed supervisory personnel has been mandated and supervisory personnel responsible for the surveillance program have initiated periodic surveillance procedural completeness review. The Plant Superintendent has emphasized the need for strict procedural compliance in our Friday morning supervisory meetings and our emphasis of this to our personnel has been strengthened.

Corrective Action to be Taken

The corrective actions identified above will continue.

Date of Full Compliance

DAEC is in full compliance.

Response to Item 1b

Corrective Action Taken

Surveillance Test Procedure STP-41A015 states "APRM calibration adjustments whould (sic, should) be made at the time in accordance with STP-42F007".

In this case, an actual APRM calibration was performed approximately 7 hours following the LPRM calibration. We note, however, that the APRM's were not in need of calibration*.

A procedure modification has been initiated to clarify that a check of APRM GAF is required subsequent to LPRM calibration and that APRM calibration is required if APRM gain adjustment factors (GAF) are above 1.00.

Corrective Action to be Taken

As discussed in response to Item 1a, procedural compliance emphasis has been strengthened.

Date of Full Compliance

DAEC is in full compliance.

*Included within the surveillance package for the July 27, 1985 LPRM calibration are the APRM GAF settings for 1015 hours and 1506 hours. These settings demonstrate that during and after the LPRM calibration (which occurred between 0835 and 1321 hours) that APRM's were in specification ($GAF \leq 1.0$). Therefore, an actual APRM calibration, which occurred at 1956 hours did not represent a significant safety hazard .