

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 May 30 through June 8, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Contrary to the above, the following instances of failure to follow procedures were identified:

- a. Safety-related temperature switches with additional design features were installed in the HPCI and RCIC systems without initiating an Engineering Work Request (EWR) as required by Procedure No. 1203.00, "Design Change Program." As a result, no safety evaluation was prepared as required by Procedure No. 1203.27, "10 CFR 50.59 Safety Evaluations for Design Changes."
- b. The time delay in the HPCI and RCIC Steam Leak Detection (SLD) system was increased from 1 second to 3.0 ± 0.5 seconds without initiating an EWR as required by Procedure No. 1203.00. As a result, no safety evaluation was prepared as required by Procedure No. 1203.27.
- c. Document Change Forms (DCFs) No. 89-T-0117 and No. 89-T-0101 which temporarily changed Surveillance Procedure No. STP-42B026-A contained an inadequate 10 CFR 50.59 applicability review. Procedure No. 1402.4, "10 CFR 50.59 Applicability Review of Plant Procedure Changes, Temporary Modifications, and Engineered Maintenance Actions," requires a 10 CFR 50.59 safety evaluation to be written if a change causes the description in the UFSAR to be inaccurate. In this case, no written 10 CFR 50.59 safety evaluation was performed when the Primary Containment Isolation/Nuclear Steam Supply Shutoff System was modified.

This is a Severity Level IV violation (Supplement I).

2. 10 CFR 50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, and deviations are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken.

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Contrary to the above, on March 3 and 30, 1989, during SLD system surveillance testing, electromagnetic interference caused the reactor recirculation pumps to overspeed. However, the licensee did not take corrective action to document or issue a temporary procedure change to lock out the recirculation pumps during subsequent SLD surveillance testing.

This is a Severity Level IV violation (Supplement I).

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 violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

8/3/89

R. W. Cooper
R. W. Cooper, Chief
Engineering Branch