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 MINECK, D.L. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Region 3, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-331/89-10.

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Iowa Electric Light and Power Company

September 1, 1989
NG-89-2610

Mr. A. Bert Davis
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 No: DPR-49
Response to Notice of Violation
Transmitted with Inspection Report 89010
Reference: Inspection Report 89010

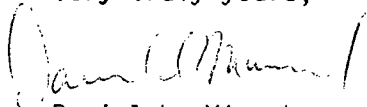
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Dear Mr. Davis:

This letter and attachment are provided in response to the Notice of Violation concerning certain activities at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact our office.

Very truly yours,



Daniel L. Mineck
Manager, Nuclear Division

DLM/JRP/gt

Attachment: Response to Notice of Violation
Transmitted with Inspection Report 89-010

cc: U. S. NRC Document Control Desk (Original)
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRR)
NRC Resident Inspector - DAEC
J. Probst
Commitment Control No. 890301

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Iowa Electric Light and Power Company
Response to Notice of Violation
Transmitted with Inspection Report 89-010

NRC NOTICE OF VIOLATION

- "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," required 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.

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 Security Level IV violation (Supplement I)."

RESPONSE TO ITEM 1 OF NOTICE OF VIOLATION

1. Corrective Actions Taken and the Results Achieved:

- a. The additional burnout protection feature was identified during post-installation functional testing of the first new switches to be installed, in September, 1988. A Nonconformance Report has now been issued documenting the installation of temperature modules containing the burnout protection feature in the Steam Leak Detection system (SLD) for the High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) systems. A 10 CFR 50.59 evaluation and conditional release for operation has been prepared. The evaluation concluded that an unreviewed safety question does not exist. All engineering documentation has been revised to reflect the addition of the burnout protection feature. A new process, the Engineering Maintenance Action, is now in use. It provides a formal mechanism for engineering input into preplanned maintenance activities. This process was in the final stages of development and implementation at the time of the temperature switch installations.
- b. An evaluation was performed for the three second time delay prior to installation. We concluded the increase in the time delay did not affect the design intent of the system. A 10 CFR 50.59 Safety Evaluation has since been completed for the time delay increase and we have concluded that the change did not constitute an unreviewed safety question.
- c. A Safety Evaluation has been performed for the revision to the surveillance test procedure. No unreviewed safety questions were identified. Interviews with the personnel involved indicate past test practices, including prior guidance provided by the NRC regarding such cases (see References I & II), were taken into account when modifying the test. Supervisory personnel were aware of the general guidance provided by the referenced UFSAR section. The lifting of leads was not considered an acceptable permanent test practice, and as a precaution additional steps were included in the procedure to verify re-termination. A UFSAR change notice has been prepared to clarify appropriate testing methodology.

2. Corrective Actions to be Taken

A revised process which allows for prompt engineering input and review of items with respect to design functional requirements and 10 CFR 50.59 concerns will be implemented by October 30, 1989. This will compliment the current EWR process, which is designed for long-term items and is not considered a mechanism for short-term engineering response.

A UFSAR change will be included in the 1990 update to clarify appropriate testing methodologies.

3. Date When Full Compliance Will be Achieved

Review of the three items of non-compliance with respect to 10 CFR 50.59 was achieved on August 28, 1989.

RESPONSE TO ITEM 2 OF NOTICE OF VIOLATION

Corrective Action Taken and the Results Achieved:

1. As stated in Inspection Report 89-10, the failure to take prompt corrective action to change the surveillance procedures was not safety significant. Control Room personnel were informed of the relationship between recirculation pump speed control and work in the Steam Leak Detection (SLD) panel shortly after its discovery on March 30, 1989. From that time, they routinely locked out the scoop tube to fix recirculation pump speed when work was ongoing in the SLD cabinet.

As the Inspection Report notes, when the problem was discovered, supervisory personnel recognized that prompt action should be taken to modify appropriate procedures. However, those changes were not completed because responsibility for doing so was not properly assigned. As stated in the Inspection Report, the procedures were modified on June 7, 1989 following NRC inquiries.

2. Corrective Actions to Be Taken:

The supervisory personnel involved will be reminded of their responsibilities to ensure adequate followup to identified deficiencies. This will be completed by September 8, 1989.

This event has been added to training courses required of supervisory personnel as an example of the need for prompt assignment of corrective action tasks in order to ensure their completion.

3. Date When Full Compliance Will be Achieved:

As noted in the Inspection Report, full compliance was achieved with the modification of the surveillance procedures on June 7, 1989.

- Reference: I. Letter, A Cappucci (NRC) to L. Liu (IELP) dtd 8-13-87
II. NRC IE Information Notice 84-37, dtd 5-10-84