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 DAVIS, A.B.      Region 3, Ofc of the Director

SUBJECT: Responds to SALP 7 Board Rept dtd 890109.

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Iowa Electric Light and Power Company  
February 15, 1989

NG-89-0538

LARRY D. ROOT  
SENIOR VICE PRESIDENT  
OPERATIONS AND PRODUCTION

Mr. A. Bert Davis  
Regional Administrator  
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U. S. Nuclear Regulatory Commission  
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Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
SALP 7 Board Report Response  
Reference: SALP 7 Board Report, Dated January 9, 1989  
File: A-103

Dear Mr. Davis:

We appreciated your visit to DAEC on January 31, 1989, and our meeting to discuss the report prepared under the Systematic Assessment of Licensee Performance (SALP) program which was transmitted by your letter of January 9, 1989. This letter provides our written response to the SALP Report and your letter.

I will first address the two aspects of the report which were highlighted in your letter. These are Emergency Preparedness, one of the functional areas which is evaluated as part of the SALP, and the Emergency Operating Procedure (EOP) program, which was evaluated as part of the functional area, Plant Operations.

Emergency Preparedness. Your letter recorded your agreement with the SALP Board that DAEC's onsite Emergency Preparedness is good but the overall rating in this area is a Category 3, with an improving trend. You emphasized the need for additional management attention to offsite emergency preparedness, noting that more timely attention would have assisted in earlier resolution of the issues raised by the Federal Emergency Management Agency (FEMA). This matter is receiving greater management attention. A number of improvements have been made and more are underway. A new position, Manager of Emergency Planning, has been established which reports directly to the Manager of the Nuclear Division. Mr. Paul Serra has been selected to fill that position. He is now recruiting personnel for a total of six positions reporting to him.

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Mr. A. Bert Davis  
February 15, 1989  
NG-89-0538  
Page 2

We will continue to improve our relationships with FEMA, NRC, and state and county officials and will keep them informed of our activities and our progress. Our expanded Emergency Planning staff will continuously review developments in this area and assure that planning for DAEC is up to date.

We intend to demonstrate during the present SALP period that Emergency Preparedness deserves at least a Category 2 rating.

Emergency Operating Procedures (EOP). Your letter indicates that our previous Category 1 rating in the functional area of Plant Operations was reduced to a Category 2 despite many "positive attributes" such as our conservative operating philosophy, the professional attitude of and effective control exercised by operations personnel, and improved unit availability. The failure to again attain a Category 1 rating is largely attributed to the quality and implementation of the EOP program.

The NRC Staff conducted a special EOP inspection at DAEC and recorded a number of criticisms. As the EOP inspection team and SALP Board recognized, one of the factors limiting the training of DAEC operators in the EOPs is the fact that IE does not yet have a DAEC-specific simulator. Our simulator is scheduled for delivery by January 1990; manufacture is currently ahead of schedule and we will continue to try to get early delivery. We have also taken steps to improve EOP training in the interim. In 1988, additional instruction in EOPs was conducted during Cycle 6 of the operator requalification program. Hours for EOP training on the Vermont Yankee simulator will be expanded during 1989. When our simulator is available, annual requalification simulator time will be substantially increased and emphasis on EOP drills and difficult accident scenarios will be augmented.

The tools and materials needed to implement the EOPs have been prestaged for operator use.

We have prepared revised EOPs which are based on Rev. 4 of the BWR Owners Group Emergency Procedure Guidelines. Beginning on February 27, the operator requalification program will include training on the revised EOPs. When all operators have completed simulator training on the revised EOPs, they will be put into effect. This is scheduled to be accomplished by July 7, 1989.

More generally, the SALP Report called attention to the need for additional management attention and greater involvement in a number of areas.

We believe that more management attention is now in evidence--particularly in the areas to which you drew attention.

The SALP Board noted the need for improvement in housekeeping in less-travelled areas of the plant. We made a major effort to improve housekeeping near the end of the 1988 refueling outage and are continuing to devote attention to this concern. The southeast corner room and the RHR valve room are now accessible in street clothes; work has begun in the torus area. We have a team dedicated to housekeeping duties in less accessible areas of DAEC. Housekeeping has always been a source of pride at DAEC and we intend to restore our level of performance to the standards required by NRC.

The SALP Report commends our efforts to improve quality, especially the Quality Enhancement Program (QEP), but notes that our QA audits need to be more "performance-based." We agree and are moving in that direction. The DAEC Safety Committee is including performance-based items in its Technical Specification audits. We will be giving this area increased attention.

The scope of IE's July 1988 maintenance audit was criticized in the Maintenance Team Inspection (MTI) and in the SALP Report. The next maintenance audit (scheduled for June 1989) will have a broader scope and the resources devoted to it will be augmented.

In connection with the SALP Report's concern regarding the closing of audit findings we have now changed the applicable procedures. Any items needing subsequent review in order to assure that corrective action is effective and adequate will be specified and the appropriate interval for follow-up will be identified. Further improvement will be accomplished by strengthening the QA surveillance program to assist in verifying that corrective actions have been implemented and are effective.

The SALP Report refers to a number of personnel errors which are reflected in Licensee Event Reports (LERs) filed by IE during the SALP period. In every case, of course, the immediate problem was solved and actions taken which are intended to prevent similar errors in the future. Nevertheless, avoidance of personnel errors will receive greater attention.

One of our efforts deserves mention. You will recall that in 1987 a substantial number of errors occurred in the course of maintenance during a refueling outage. These errors resulted in repeated initiations of engineered safety features (ESF) while the plant was shut down. We developed and issued new guidance which is intended to prevent actuation of ESFs through detailed planning of maintenance activities including identification of any particular actions which have a potential for such actuation. This guidance reduced the number of ESF actuations which occurred in the outage subsequent to the SALP report.

A number of personnel errors occur because of the procedures which the personnel follow in performing their work. We have developed writer's guides for the authors of maintenance procedures, surveillance procedures, and operating instructions to help them develop better and more consistent procedures. As the SALP Report recognizes, our Surveillance Test Evaluation and Enhancement Program (STEEP) is a continuing activity. The first phase of STEEP has been completed and we have moved into the next phase, utilizing and refining the new procedures and tracking mechanisms that were developed in the

Mr. A. Bert Davis  
February 15, 1989  
NG-89-0538  
Page 4

earlier phase. Our experience thus far is good and we expect that to continue. You may be assured that we will continue to work to eliminate personnel errors.

A new functional area evaluated in the SALP process is Engineering/Technical Support. We were rated Category 2 in this area. There was praise for our performance in some respects. For example, we were said to have a good understanding of technical issues and regulatory requirements in the ATWS modifications, excellent engineering and technical support for the DCRDR Program, a high level of engineering expertise in addressing IGSCC problems, and aggressiveness in resolving the issues addressed in NRC Bulletins. However, the report also cited increased need for management attention to technical support for maintenance, root-cause analysis of equipment failures, and engineering reviews.

We are evaluating steps to better coordinate the analytical and maintenance capabilities which are located in the Maintenance, Technical Support and Engineering Departments. This effort will involve improvements in trending and analysis for rework items, review and utilization of industry operating experiences, and root-cause analyses of equipment failures as well as purchase of additional monitoring equipment for predictive maintenance. We have designated twenty-four engineers as system experts. Nine of these engineers are also licensed Senior Reactor Operators and ten are Shift Technical Advisors. The primary role of a system expert will be to upgrade and maintain the performance of the system or systems assigned to him.

We have developed procedures for analyzing for the root-cause of equipment failures and will provide additional training in utilization of these analytical techniques in order to improve performance. We are investing time to train key individuals in the Human Performance Evaluation System (HPES) technique. We also intend to improve our engineering reviews through use of a training module (now being developed) which uses our Nuclear Safety Operational Analysis (NSOA). It is our goal to improve our performance in this area significantly during this SALP period. We will appreciate receiving the views of Region III personnel and especially the Resident Inspectors on the success of our efforts as the period progresses.

Your letter of January 9 underscores the SALP Board's comments regarding a noted decline in IE's aggressiveness in pursuing resolution of problems or concerns identified by IE or the NRC's resident inspectors and NRC initiatives. We agree that the examples cited in the SALP Report (e.g., the masonry wall, soft seat check valves, the "B-023" deficiency, and drywell temperature concerns) have given rise to that perception of reduced "aggressiveness." Most of the examples demonstrate the need for more prompt action in addressing technical issues whether brought to our attention by the NRC or discovered by our Staff.

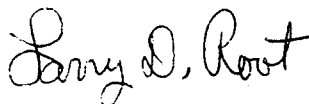
The SALP Report has brought home to us the importance of resolving, quickly and consistently, such technical issues. We must communicate effectively with the NRC and we must make timely responses to these issues. We intend to do so. As Mr. Liu assured you on January 31, we have had meetings with all supervisors in the Nuclear Division to be sure they understand what it means to Iowa electric to be responsive to the NRC on a timely basis. IE employees understand

Mr. A. Bert Davis  
February 15, 1989  
NG-89-0538  
Page 5

that we must achieve much better performance on this point in the coming months. We would welcome your comments on our progress in this regard.

We realize this letter does not address specific details about some of our proposed actions. We look forward to our next routine meeting at which we will discuss further the actions we are taking in response to the SALP Report.

Very truly yours,



Larry D. Root  
Senior Vice President  
Operations and Production

LDR/SLS/pjv+

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