NOTICE OF VIOLATION

Duane Arnold Energy Center

License No. DPR-49

As a result of the inspection conducted on August 25 through October 12, 1990, 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 50 Appendix B, Criterion V, states that activities affecting quality shall be accomplished in accordance with prescribed instructions, procedures, or drawings.

- a. Contrary to the above, on or about August 6, 1990, the licensee failed to accomplish the cutting of Control Rod Drive (CRD) withdrawal lines as required by Design Change Procedure (DCP) 1501. Specifically, CRD line 10-07 was cut instead of the required line 14-07. Line 10-07 did not have a freeze seal installed at the time of the cut, and resulted in gross leakage of the line into the reactor building (331/90017-05a).
- b. Contrary to the above, on or about August 6, 1990, the licensee failed to accomplish the cutting of CRD insert line 26-43 as required by DCP 1501. Specifically, CRD line 26-43 was initially cut on the wrong side of a coupling weld from what the DCP had specified (331/90017-05b).
- c. Contrary to the above, on or about August 5, 1990, the licensee failed to accomplish the bolt torquing activities required in Corrective Maintenance Action Request (CMAR) 98620. Specifically, the yoke to bonnet bolts for Motor Operated Valves M04627 and M04628 were not torqued as required by the CMAR. As a result, the yoke of valve M04627 turned and caused the valve motor to trip during operability testing (331/90017-05c).
- d. Contrary to the above, on or about August 11, 1990, the licensee failed to accomplish maintenance activities required by the CMAR associated with Safety Relief Valve Nitrogen Supply Valve V-14-15. Specifically, maintenance was performed on valve V-14-14 in error, rather than valve V-14-15 as required by the CMAR. In addition, after the mistake was realized, field workers removed the internals from V-14-15 and replaced them with the modified internals from V-14-14 without a work order to correct the original error (331/90017-05d).
- e. Contrary to the above, on or about August 22, 1990, the licensee failed to accomplish modification activities as required by DCP 1492. Specifically, the tubing for excess flow check valves XFV2443B and D were improperly connected to the wrong valves. Tubing designated by DCP 1492 to be connected to XFV2443B was connected to XFV2443D, while that tubing designated for connection to XFV2443D was connected to XFV2443B (331/90017-05e).
- f. Contrary to the above, on or about August 24, 1990, the licensee failed to correct an identified error in a Surveillance Test procedure (STP) as required by Administrative. Procedure 1406.3. Specifically, the licensee

continued to perform STP 43B001 using an incorrect procedure, in that they were aware the procedure specified incorrect annunciator locations, without making the necessary temporary or permanent revision to correct the errors (331/90017-05f).

Collectively, these are considered a Level IV Violation (Supplement 1).

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.

November 13, 1990

Hubert J. Miller, Director Division of Reactor Projects