Iowa Electric Light and Power Company August 5, 1982 DAEC-82-523

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Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
1717 H. Street N.W.
Washington, D. C. 20545

Re: Duane Arnold Energy Center

Subject: Environmental Technical Specification

Violation Report 82-3

File: A-117, TE-4

Dear Mr. Denton:

This report is submitted in accordance with the requirements of Appendix B to Operating License DPR-49, Specification 3.3.1.C.1.a.

Problem.

During normal operation while obtaining the monthly offgas stack sample, a health physics (HP) technician found offgas stack sample line isolation valve V-41-3 in a partially-closed position and process radiation filter holder 1S-217 improperly connected to the sample line. This condition resulted in the offgas stack sample being diluted by air from outside the offgas stack. This condition was discovered on July 27, 1982 at 0745 and the offgas sample line-up was immediately restored to normal. Offgas stack radiation monitoring is required by DAEC Technical Specification, Appendix B, Section 2.3.1.C.8.

Investigation

It was determined that the diluted offgas stack sample was caused by a personnel error. On July 26, 1982 at 0020, an HP technician replaced the particulate filter and iodine cartridge in offgas stack process radiation filter holder 1S-217. In returning the offgas stack sample line to operation, the technician improperly reconnected the filter holder to the sample line and throttled isolation valve V-41-3 to adjust offgas stack sample flow. This condition allowed outside air to enter the sample line at the filter holder connection.

During the 31.4 hours that the offgas stack sample was diluted, the newly-installed Kaman effluent monitoring system was monitoring the offgas stack. Although the Kaman system was not fully calibrated and

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operational for monitoring gaseous releases, the particulate and iodine collection functions were operational. Information from the Kaman system is sufficient to support the conclusion that the technical specification limits for the release of radioactive particulates and iodine were not approached.

To obtain an estimate of the release rate of gaseous activity through the offgas stack during this period, a ratio of the count rates received during normal operation from post-treatment radiation monitors RE-4101A and -4101B and offgas radiation monitors RE-4116A and -4116B was determined. This ratio was then applied to the post-treatment count rate received during the period that the offgas sample was diluted to determine the appropriate offgas release rate. The highest offgas stack gaseous activity release rate for this time period was 0.0007% of the administrative limit (4%) described in Technical Specification, Appendix B. Section 2.3.1.C.3.b.

Corrective Action

Upon discovery, the offgas sample line-up was immediately restored to normal by fully opening isolation valve V-41-3 and properly connecting filter holder 1S-217 to the sample line. The appropriate personnel were retrained on the proper replacement of the offgas particulate filter and iodine cartridge. Specifically, the retraining included maintaining offgas sample isolation valves fully-opened and properly reconnecting the filter holder to the sample line.

This report has been reviewed and approved by the DAEC Operations Committee and Safety Committee.

Very truly yours,

Daniel L. Mineck

Plant Superintendent - Nuclear

Duane Arnold Energy Center

DLM/DMV/p1

cc: J. Keppler

U. S. Nuclear Regulatory Commission c/o Document Management Branch Washington, D. C. 20555 (1)

Resident NRC Inspector - DAEC

K. Eccleston