

Iowa Electric Light and Power Company

October 8, 1979
LDR-79-231

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 79-20

File: A-102 Inspection Report 79-20

Dear Mr. Keppler:

This letter is in response to Mr. Heishman's letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on August 28-31, 1979. The following response indicates the action which has been taken to correct the deficiency noted in the subject report.

Deficiency

Section 6.8.3 of the Technical Specifications and Section 5.1.7 and 5.1.9 of Administrative Control Procedure No. 1402.2, Revision 4, "Revisions to Plant Procedure/Instructions," require that temporary changes to procedures shall be documented and promptly reviewed by the Operations Committee and Chief Engineer.

Contrary to the above, on March 6, 1979, a temporary procedure change was made to Surveillance Test Procedure No. 43A001, Revision 1, "Shutdown Margin Test," to allow further withdrawal of control rods instead of inserting control rods fully as stated in Procedure Step 4.7 without documentation and prompt review.

Response

1. General

Prior to power range operation of cycle 4B, it was necessary to: 1) conduct Surveillance Test Procedure 43A001, Revision 1, "Shutdown Margin Test," and 2) perform a hot hydrostatic test of the primary boundry to verify the integrity of the recently repaired recirculation inlet nozzle safe-ends. Since nuclear heat is required to perform the hydro, it was decided that the most efficient, operational approach to pressurize the system was to continue rod withdrawal directly after establishing the required shutdown margin. This decision received prior review by the Shift Supervising Engineer, Reactor Engineer and the Operations Supervisor, thus meeting the intent of Administrative Control Procedure 1402.2. However, due to an oversight, the temporary change documentation required by the Technical Specifications and Administrative Control Procedures was not prepared for STP 43A001.

2. Corrective action taken and the results achieved:

Appropriate Plant Supervisors have reviewed the requirements of Administrative Control Procedure 1402.2 with the personnel involved. In addition, STP 43A001 has been modified, deleting the requirement to return the reactor to an all-rods-in configuration after verifying that the required shutdown margin exists. This change will provide the flexibility needed to conduct post refueling start-ups in a more efficient manner.

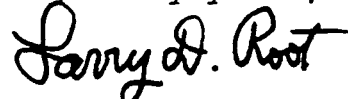
3. Corrective action to be taken to avoid further noncompliance:

No further corrective action is planned at this time.

4. Date when full compliance will be achieved:

Not applicable.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/JCZ/lh

cc: Director, Office of Inspection and Enforcement
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