U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-331/79-32

Docket No. 50-331

License No. DPR-49

14/80 14/80 14/80 18/8.

Licensee: Iowa Electric Light and Power Company P. O. Box 351 Cedar Rapids, Iowa 52406

Facility Name: Duane Arnold Energy Center

Inspection At: Duane Arnold Energy Center, Palo, Iowa

Inspection Conducted: September 21, and December 10-13, 1979

Inspector: G. C. Wright (December 10-13, 1979 only)

K. R. Baker (September 21, 1979 only)

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Approved By: R. L. Spessard, Chief Reactor Projects Section 1

Inspection Summary

Inspection on September 21, and December 10-13, 1979 (Report No. 50-331/79-32) Areas Inspected: Routine, unannounced inspection of plant operations, Licensee Event Report followup and IE Bulletin followup, also inspection of Containment Leak Rate Testing. The inspection involved 40 inspector-hours onsite by two NRC inspectors.

<u>Results</u>: Of the areas inspected, one apparent item of noncompliance (Infraction - repetitive - failure to store equipment as prescribed) was identified.



DETAILS

1. Persons Contacted

- *D. Mineck, Chief Engineer
- *D. Wilson, Technical Engineer
- *B. York, Operations Supervisor
- *J. VanSickel, Assistant Technical Engineer

The inspector also interviewed several other licensee employees including; Shift Supervising Engineer, Nuclear Station Operators, Warehouse Personnel, and onsite engineering personnel.

*Denotes those present as the exit interview.

2. Licensee Event Report Followup

Through direct observation, discussions with licensee personnel, and review of records, the following event reports were reviewed to determine that reportability requirements were fulfilled, immediate corrective action was accomplished, and corrective action to prevent recurrence had been accomplished in accordance with Technical Specifications.

- a. LER 79-09 (Closed)
- b. LER 79-13 (Closed)
- c. LER 79-17 (Closed)
- d. LER 79-20 (Closed)
- e. LER 79-22 (Closed)
- f. LER 79-23 (Closed)
- g. LER 79-24 (Closed)
- h. LER 79-26 (Closed)
- i. LER 79-27 (Closed)
- j. LER 79-28 (Closed)
- k. LER 79-29 (Closed)
- 1. LER 79-15 (Closed): This item is considered a licensee identified item of noncompliance.

m. LER 79-21 (Closed): An update report is due when a determination is made as to the failure mechanism of the valve. (331/79-32-01).

No items of noncompliance were identified.

IE Bulletin Followup

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For the IE Bulletins listed below, the inspector verified that the written response was within the time period stated in the bulletin, that the written response included the information required to be reported, that the written response included adequate corrective action commitments based on information presented in the bulletin and the licensee's response, that licensee management forwarded copies, of the written response, to the appropriate onsite management representatives, that information discussed in the licensee's written response was accurate, and that corrective action taken by the licensee was as described in the written response.

- a. IEB 79-04 (Closed)
- b. IEB 79-09 (Clsoed)
- c. IEB 79-10 (Closed)
- d. IEB 79-11 (Closed)
- e. IEB 79-12 (Closed): The licensee's response in the area of Estimated Critical Position (ECP) for control rods does not meet the request in the bulletin. However, discussions with IE Headquarters indicates that a final resolution on ECP's has not been reached.
- f. IEB 79-18 (Closed): Two open items remain:
 - (1) Installation of additional paging system speakers (331/79-32-02)
 - (2) Audibility testing of presently, "inaccessible" areas during the 1980 refueling outage. (331/79-32-03)
- g. IEB 79-23 (Closed)
- h. IEB 79-24 (Closed)
- No items of noncompliance were identified.

4. Review of Plant Operations

The inspector conducted a review of plant operations to ascertain whether facility oepration was in conformance with Technical Specifications, regulatory requirements, and administrative procedures.

The inspector reviewed selected operating records for the period of October 1 - December 10, 1979. These included: Control Room Operator's Daily Logs, Shift Supervising Engineer's Daily Logs, Jumper and Lifted Lead Log, Operating Order Book, selected Hold/Caution Cards, and Deviation Report Log.

The inspector discussed the reportability of Deviation Report No. 79-201, dealing with RCIC being taken out-of service to perform corrective maintenance on a valve packing. The inspector noted that the blown packing in itself did not render the RCIC system inoperable. The licensee originally classified the DR as non-reportable since they felt they were performing preventative maintenance on the valve. The inspector pointed out that it is our position that maintenance on an item which has already failed can not be classified as preventative and therefore, the exemption on 30 day reports for preventative maintenance did not apply in this case. The licensee agreed to submit a report within 30 days of December 11, 1979.

The inspector conducted a tour of the control room and other accessible plant areas to observe: Instrumentation; radiation, fire prevention and equipment tagging controls; housekeeping; and the status of selected plant systems and equipment.

No items of noncompliance were identified.

5. Independent Inspection

a. During a routine walk-through of the turbine building the inspector observed several switchgear and associated breakers in the turbine building trackway. Investigation and interviews with plant personnel indicated that the breakers and switchgear had been removed from the warehouse around November 8, 1979. The idea was to place the equipment in the area where they were to be installed which was considered to meet storage Level B requirement on temperature and humidity. While attempting to place the switchgear into the room it was found that they would not fit through the door. The equipment was then moved back to the trackway and left.

The inspector noted that the plastic wrapping on the switchgears was not in place in a manner to protect the equipment and, the shipping container for one breaker had been removed leaving the breaker exposed.

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10 CFR 50 Appendix B, Criteria XIII states in part, "...Measures shall be established to control the...storage...and preservation of material and equipment in accordance with work and inspection instructions".

QAD 1313.1 states in part, "...Special coverings, equipment, and protective environments...shall be specified, provided, and their use verified where necessary.

Contrary to the above, on December 11, 1979, the inspector observed that the Recirculation System Switchgear and associated breakers marked for Level B storage were not being stored in accordance with approved procedures. Further, the condition had existed for approximately four and one half weeks.

This item is considered a repetitive infraction. Refer to IE Inspection Report No. 50-331/78-12.

b. The inspector reviewed the licensee's progress towards upgrading the warehouse to a Level B storage area. The inspector noted that no work had been done to date in the areas of temperature and humidity control and reminded the licensee of his commitment date of December 31, 1979, to be in full compliance with his approved QAD's and ACP's governing storage of materials and equipment.

c. The inspector reviewed and discussed with the licensee the recent event pertaining to Oxygen and Hydrogen analyzers for the drywell and suppression pool. It was noted that for the 7 1/2 hours that the "B" monitor was inoperative and the "A" monitor was unable to be aligned to the suppression pool that no action was taken by the licensee to remove the unit from power operation. The Technical Specification LCO states that the unit "must be removed from power operation" if there isn't at least one monitor for the drywell and suppression pool. It is to be noted that no specific time limit is indicated.

Discussions with NRR and the Licensee indicate that the licensee misinterpreted the Tech. Spec. requirement and has agreed to submit a Technical Specification change to avoid further confusion in this area.

The inspector further informed the licensee of the requirements of 10 CFR 50.36.(c).(2) which states in part "When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shutdown the reactor or follow any remedial action permitted by the technical specifications..."The inspector indicated that "shutdown" in this case should be a normal, orderly

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shutdown, also, implicit in 50.36 is that if no "remedial action" is given in the Technical Specfication that the licensee is to commence an orderly shutdown.

Other than Paragraph 5.a above no items of noncompliance were identified.

Containment Leakage Testing

An in-office review of the licensee's reports regarding 1978 reactor containment leak testing $\frac{1}{}$ was conducted. The review raised questions regarding the blind flanges installed on the main steam isolation valve (MSIV) stem packing leak off lines. The blind flanges were installed to obtain a satisfactory local leak rate test on the MSIV's. These questions were followedup onsite on September 21, 1979.

The onsite review was an attempt to determine; if the flanges were installed during the integrated leak rate test; whether design change controls were implemented for the change; whether the unit was operated with the flanges; and what testing the flanges had received.

In addition to the test reports the following documents were reviewed onsite:

- a. Design Change Request (DCR)-721
- b. Maintenance Action Request (MAR)-21802
- c. Piping and Instrument Diagram M-114 and -137
- d. Drawings FSK-4188, 3585-B, 4272, 4528, 4272, 4258 and manufacture's drawings of the MSIV

The following was determined:

- a. The MSIV's stem leakoffs were blanked on March 20, 1978
- b. Integrated tests were conducted April 16, 1978
- c. Design Change request DCR-721 was initiated on April 4, 1978 and approved April 18, 1978. The maintenance request to install the design changes was completed on October 26, 1978
- d. The unit was operated for a period of time between April 18, 1978 and October 26, 1978.
- 1/ Reactor Containment Building Local Leakage Rate Testing 1978 Spring Refueling and Maintenance Outage and Reactor Containment Building Integrated Leakage Rate Test, transmitted by licensee's letter dated July 28, 1978.

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e. Records and discussion would indicate that a set of blind flanges were installed on March 20, 1978 and were replaced with flanges as specified in DCR-721 during the period October 14-26, 1978.

An unresolved item remains as to what reviews and approvals were made for the flanges installed between March and October 1978 to determine if the installation was within the requirements of 10 CFR 50.59, the licensee's QA program and applicable piping codes. (331/79-32-04)

The inspector questioned the licensee regarding the routing of the leakoff line. The licensee stated the leakoff line was routed back into the drywell. The inspector then questioned why no test had been conducted as required by Technical Specification 4.7. The licensee reviewed the items and concluded that the line should have been subjected to a local leak test following the installation of the flanges in October, 1978. Preparation was made for shuting down and conducting the test. Before the shutdown was completed a review of drawings revealed the licensee was incorrect in believing the leakoff line returned to the drywell and hence no testing was required by Technical Specification 4.7.

7. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on December 12, 1979. The inspector summarized the scope and finding of the inspection.

Subsequent to the exit interview the inspector, on December 13, 1979, witnessed that action was being taken to correct the item of noncompliance discribed in Paragraph 5.a above. Corrective action was to move the switchgear to the warehouse and plans were underway to move the breakers to the Recirculation M-G set room.

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