

Iowa Electric Light and Power Company

January 29, 1980

LDR-80-41

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, IL 60137

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 79-25

File: A-102 Inspection Report 79-25

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 October 9-12, 18-19, 25-26 and November 1-2, and 20, 1979. The following responses indicate the actions which have been or will be taken to correct the items of noncompliance noted in the subject report.

Deficiency

10 CFR 50.59 states that "The licensee shall also maintain records of tests and experiments carried out pursuant to paragraph (a) of this section. These records shall include a written safety evaluation which provides the basis for the determination that the change, test or experiment does not involve an unreviewed safety question.

Technical Specification 6.5.2.7 requires the Safety Committee to review: "a. The safety evaluations for (1) changes to procedures and (2) tests or experiments completed under the provisions of Section 50.59, 10 CFR to verify that such actions did not constitute an unreviewed safety question ... c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR."

Contrary to the above, when Special Test Procedure #25 was reviewed by the Operations Committee and forwarded to the Safety Committee, neither the minutes, nor the "Safety Analysis" section of the procedure record any basis for a determination nor is any conclusion documented. Minutes from Safety Committee meeting #115 only state that it was "reviewed and approved."

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Response

1. Corrective action taken and the results achieved:

Special Test Procedure #25 was performed during calendar year 1975. To complete our records, we will develop the required safety evaluation by March 1, 1980.

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

Appropriate plant supervisors will be instructed to ensure the applicable requirements of ACP 1408.4, "Special Test Procedures", are complied with.

3. Date when full compliance will be achieved:

The above noted actions will be completed by March 1, 1980.

Deficiency

10 CFR Part 50, Appendix B, Criterion II states that "This (Quality Assurance) Program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instructions."

Administrative Control Procedures (ACP) 1402.3 "Procedure/Instruction Review and Approval" requires that special test procedures be reviewed and approved by several plant personnel and at least the Operations Committee including the Reactor and Plant Performance Engineer.

Contrary to the above, Special Test Procedure #55, February 22, 1979 was not reviewed and approved by the Reactor and Plant Performance Engineer.

Response

1. Corrective action taken and the results achieved:

It should be noted that although the Reactor and Plant Performance Engineer did not sign Special Test Procedure #55, the test was prepared and signed by a member of the Reactor Engineering Staff who is authorized to sign for the Reactor and Plant Performance Engineer. However, the Reactor and Plant Performance Engineer will review and sign Special Test Procedure #55.

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

Appropriate plant supervisors will be instructed to ensure the requirement of ACP 1402.3, "Procedure/Instruction Review and Approval", paragraph 5.13, are complied with.

3. Date when full compliance will be achieved:

The above noted instructions will be issued by March 1, 1980.

Deficiency

10 CFR, Part 50, Appendix B, Criterion II states that "The applicant shall identify the structures, systems, and components to be covered by the quality assurance program. QAD 1301.4, Rev. 3, 4/2/79 states that "lists of safety related structures, systems and components....shall be prepared" and that "a system shall be established for distribution and control of the Safety Related List."

Contrary to the above an official Safety Related List had not been issued for use and procedures controlling the Safety Related List did not exist. This is a deficiency.

Response

1. Corrective action taken and the results achieved:

See response to Item #2 below.

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

A safety related list has been drafted and is presently in the review process prior to becoming an approved design document. A general office Administrative Control Procedure is currently being prepared which will govern the use of and changes to the safety related list.

3. Date when full compliance will be achieved:

It is anticipated the above documents will receive final review and approval by April 30, 1980.

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Deficiency

10 CFR, Part 50, Appendix B Criterion II states that "This program will be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures. QAD 1301.3 requires managerial reporting of QA program status utilizing monthly audit status reports which include reports on activities having significant impact on plant quality trends. QAP 1405.2 requires that the status reports include major nonconformances, corrective actions, and results of audits.

Contrary to the above a review of status reports revealed that the reports did not include activities and findings having significant impact on plant quality trends.

Response

1. Corrective action taken and the results achieved:

In accordance with the requirement of QAD 1301.3 item 5.2, the Quarterly Report has and continues to plot those quality trends indicated by the Monthly DAEC Reports. As a result of the implementation of ACP 1405.4, Revision #2 in July 1979, ACP 1405.9 Revision #0 in August 1979 and ACP 1405.3 Revision #1 in September 1979 all DAEC Audit Findings and Nonconformance/Procurement Reports are now tabulated by the Monthly Report. This information is subsequently reviewed and reported in the Quarterly Report as required by QAD 1301.3.

Due to the many alternatives in Corporate Documentation, including those listed above, the Quarterly Report for First Quarter 1980 will have a significantly altered format. However, the Report will continue to address the current requirements of QAD 1301.3.

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

No further corrective action is planned at this time.

3. Date when full compliance will be achieved:

Not applicable.

Deficiency

10 CFR, Part 50, Appendix B, Criterion II states that "This (Quality Assurance) Program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instructions."

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QAD 1311.1 requires that the Surveillance Program identify all surveillance tests and control their performance, evaluation of results and records.

Contrary to the above, the procedure covering Surveillance Requirement 4.6.A.1 is not addressed, controlled or treated as a surveillance requirement as required by QAD 1311.1.

Response

1. Corrective action taken and the results achieved:

See response to Item #2 below.

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

As noted in the inspection report the surveillance requirement to monitor and record reactor coolant heatup and cooldown was being accomplished through an integrated plant operating instruction. In order to completely satisfy QAD 1311.1 a new surveillance test procedure will be developed which will implement the surveillance requirements of Technical Specification paragraph 4.6.A.1.

3. Date when full compliance will be achieved:

The new surveillance test will be developed and implemented prior to plant startup from the 1980 refueling outage.

Infraction

10 CFR 50 Appendix B, Criterion V states that activities affecting quality shall be accomplished in accordance with instructions, procedures, or drawings.

Contrary to the above, ACP 1401.4 and 1404.5 were not adhered to as required.

- a. Safety-related maintenance activity requests were not initialed by the originator's supervisor as required by Section 6.3 of ACP 1401.4 "Control of Plant Work".
- b. Hold-off tag placement on two safety-related valves, during repairs of a leak on the HPCI/RCIC drain to the main condenser, was not verified by the individual or responsible supervisor as required by ACP 1404.5 "Hold-off Procedure."

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Response

1. Corrective action taken and the results achieved:

See response to Item #2 below.

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

- a. The requirement for the originators supervisor to review and initial the MAR form will be eliminated from ACP 1401.4. Sufficient MAR review by operations and maintenance supervisors remains to ensure proper MAR system implementation.
- b. Appropriate plant personnel will be reinstructed concerning the requirements of ACP 1404.5.

3. Date when full compliance will be achieved:

ACP 1401.4 will be modified by March 1, 1980. The personnel reinstruction will be completed by April 1, 1980.

Infraction

10 CFR 50 Appendix B, Criterion VI states that measures shall assure that documents such as drawings are distributed to and used at the location where the prescribed activity is performed.

QAD 1306.1, Section 5.6 requires that all design documents shall be controlled as necessary to preclude the use of outdated or inappropriate documents.

Contrary to the above, two drawings in the control room stamped "Controlled Document" were found to be out of date.

Response

1. Corrective action taken and the results achieved:

The two drawings in question were replaced with drawings of the most current revision.

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

Clerical help has been assigned to the operations department whose responsibilities include ensuring control room controlled drawings are maintained current as per the most recent DAEC master document list.

3. Date when full compliance will be achieved:

The plant is currently in compliance on this matter.

Licensee Identified Item

10 CFR Part 50, Appendix B, Section II states that "This Quality Assurance Program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures or instructions, "ACP 1401.5 states that "The Assistant Chief Engineer, the Training Coordinator, and the Plant Supervisors shall define the qualifications for each position within their area of responsibility..." Contrary to the above, the qualification requirements of non key supervisory personnel are not specified in the Training Program. This item was identified by the Safety Committee Audits of 1977 and 1979 and no corrective action had been proposed at the time of the inspection.

Response

1. Corrective action taken and the results achieved:

See response to Item #2 below.

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

ACP 1401.5 will be modified to state that the qualification requirements for non key supervisory personnel shall be as outlined in ANSI 18.1, 1971 Edition.

3. Date when full compliance will be achieved:

ACP 1401.5 will be modified by April 1, 1980.

Very truly yours,

Larry D. Root

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Assistant Vice President
Nuclear Generation

LDR/JVS/mz

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