

Iowa Electric Light and Power Company

April 11, 1980

LDR-80-103

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

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

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 80-03

File: A-102, Inspection Report 80-03

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 February 19-22, 1980. The following responses indicate the actions which have been taken to correct the items of noncompliance noted in the subject report.

Infraction

Technical Specification Section 6.4.2 states in part ". . . fire brigade training sessions. . . shall be held at least quarterly."

Contrary to the above, fire brigade training had not been held during the period of July, 1978 to June, 1979.

Response

1. Corrective action taken and the results achieved:

Quarterly fire brigade training has been conducted from June 1979 to present. This training has been in the form of both classroom training and fire brigade drills. In addition, the DAEC Fire Plan has been revised and includes fire brigade training requirements as well as detailing responsibility for meeting those requirements. Also the DAEC training coordinator has been appointed fire marshall and as such is responsible for scheduling and ensuring the completion of fire brigade training.

APR 16 1980

Mr. James G. Keppler
Page 2
April 11, 1980

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

The corrective actions already implemented should be sufficient to avoid further noncompliance.

3. Date when full compliance will be achieved:

DAEC has been in compliance since June 1979. The DAEC Fire Plan revision was approved February 20, 1980. The Training Coordinator was appointed Fire Marshall on February 20, 1980.

Infraction

Technical Specification Section 6.8 states in part "detailed written procedures involving nuclear safety. . .shall be prepared. . .all procedures shall be adhered to." Included in section 6.8.1 is "Fire Protection Plan Implementation."

Contrary to the above the monthly fire extinguisher inspections required by the DAEC Fire Plan and Inspection Procedure IP-013/IE-3 have not been performed from 1977 to date.

Response

1. Corrective action taken and the results achieved:

Inspection Procedure IP-013/ie-3 was performed for all fire extinguishers in the power block buildings, administration building, pumphouse and intake structure.

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

A "DAEC" Scheduled Maintenance Report" (mini-MAR) will be generated on a monthly basis which will be assigned to the operations department and will require the completion of IP-013/ie-3. Until this formal mechanism is available the operations supervisor and fire marshall shall ensure this inspection procedure is accomplished on a monthly basis.

3. Date when full compliance will be achieved:

IP-013/ie-3 was completed for the above listed buildings by March 15, 1980. We currently anticipate a mini-MAR will be available to formally schedule and document completion of IP-013/ie-3 by May 1980 when the regular monthly mini-MAR issue is published.

Mr. James Keppler
Page 3
April 11, 1980

Deficiency

Technical Specification Section 6.8 states in part "detailed written procedures involving nuclear safety, including applicable check-off lists. . . shall be prepared. . ."

Operating instruction #53 "standby liquid control system" Appendix I indicated that air sparger, air inlet valve U-26-11 is to be locked closed.

Contrary to the above STP 44C01 "standby liquid control system Boron Concentration" does not contain sufficient direction and/or check sheets to prevent valve U-26-11 from being left unlocked at the conclusion of the procedure. This was the case when the inspector observed valve U-26-11 to be unlocked after the completion of STP 44C001.

Response

1. Corrective action taken and the results achieved:

Appendix I to Operating Instruction #53 is a prestartup checklist so V-26-11 would have been locked closed prior to startup from the current refueling outage. Nonetheless, STP 44C001 has been modified to require V-26-11 be closed and locked at the conclusion of the surveillance test.

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

See Item #1 above.

3. Date when full compliance will be achieved:

STP 44C001 was modified as stated above effective April 9, 1980.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/JVS/n

cc: Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

D. Arnold, S. Tuthill, L. Liu, D. Mineck, K. Meyer, D. Wilson,
R. Lowenstein