

Iowa Electric Light and Power Company

April 30, 1980
LDR-80-123

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 80-04
File: A-102, Inspection Report 80-04

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 March 18-21, 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 6.8.2 states in part: "Procedures...and changes thereto, shall be reviewed...and approved...prior to implementation except as noted in section 6.8.3..." Technical Specification section 6.8.3 states in part: "Temporary minor changes to procedures...which do not change the intent...may be made with the concurrence of two members of the plant management..."

Contrary to the above, between March 10 and March 18, 1980, numerous changes to procedure RP83/ie-2 Revision 1 were made without either prior approval or concurrence by two members of the plant management.

Response

1. Corrective action taken and the results achieved:

Modifications were made to RP83/ie-2 which permanently incorporated the recommended changes of the vendor representatives and clarify the procedure to preclude any misinterpretation as to the intent of the procedure in the future.

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

Plant managers were advised of the requirements of Technical Specification 6.8.3 that temporary procedure changes made with the concurrence of two plant managers be only minor in nature and that the changes must not change the intent of the original procedure. The plant managers were further reminded that these changes should avoid presenting the opportunity for interpretations which could significantly alter the intent of the procedure.

3. Date when full compliance will be achieved:

Revision 2 to RP83/ie-2 was approved on March 20, 1980. A memo to plant managers concerning Technical Specification 6.8.3 requirements was distributed on April 30, 1980.

Infraction

10 CFR 50 Appendix B Criteria XVI "Corrective Action" states in part... "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected..." Iowa Electric Quality Directive 1316.1 "Corrective Action" states: "Systems shall be implemented to assure that conditions adverse to quality are promptly identified and corrected as soon as possible."

Contrary to the above, between March 10 and March 18, 1980 numerous items were identified, during QC inspections dealing with failure to follow procedure RP83/ie-2 revision 1; with no prompt corrective action being taken to correct the situation.

Response

1. Corrective action taken and the results achieved:

Work was halted on the MSIV repairs and the changes to RP83/ie-2 noted in the response to the first infraction were implemented.

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

No further action is planned.

3. Date when full compliance will be achieved:

Work was halted on March 20, 1980 and the changes to the Repair Procedure were implemented.

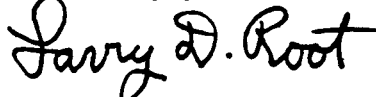
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Although corrective actions have been implemented to address the infractions identified in the Inspection Report, the licensee notes that the conditions do not appear to clearly represent a violation of the Technical Specifications. In accordance with the Technical Specifications, temporary minor changes to procedures may be made which do not change the intent of the procedure. Since the intent of the procedure in question was to provide instructions per vendor recommendations and since the specific changes were in fact per vendor recommendations, the intent of the procedure was not changed. Thus, it would appear approval of DCF 2439 by two members of plant management was within Technical Specification requirements.

It should also be noted that the General Inspection Reports (GIR) referred to in the Inspection Report were being generated not to document procedure violations but rather as a routine report on the activities which the inspector had been assigned to observe. Had the Quality Control Department determined a procedure violation had occurred, a Corrective Action Report (CAR) would have been initiated.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/JVS/mz

cc: Director, Office of Inspection and Enforcement
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