

Iowa Electric Light and Power Company

October 24, 1980  
LDR-80-297

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
OF NUCLEAR DIVISION

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 80-13

File: A-102, NRC-4, Inspection Report 80-13

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 1-31, 1980. The following responses indicate the actions which have been taken to correct the item of noncompliance noted in the subject report.

Infraction

Technical Specifications Section 4.7.A.2.d.3 states "Type C tests shall be performed during each reactor shutdown for major refueling or other convenient interval but in no case at intervals greater than two years."

Contrary to the above, the HPCI/RCIC Exhaust Vacuum Breakers listed in Technical Specification Table 3.7-2, were not tested from initial installation in June, 1974 to March, 1980 thereby exceeding the two year interval.

Response

1. Corrective action taken and the results achieved:

The HPCI/RCIC Exhaust Vacuum Breakers (MOV 2290A and MOV 2290B) were leak rate tested during the 1980 refueling outage with satisfactory results. MOV 2290A and MOV 2290B have been added to Surveillance Test Procedure (STP) 47A005, "Containment Isolation Valve Leak Tightness Test - Type C Penetrations", which is performed

during each refueling outage. In response to the Inspection Report cover letter concern, a check was made to determine if all valves listed in Technical Specification Table 3.7-2 were included in STP 47A005. With the exception of those manual valves which are to be deleted from Table 3.7-2 as a result of Proposed Change to DAEC Technical Specifications RTS-112, all of the valves required to be tested are included in the Surveillance Test Procedure.

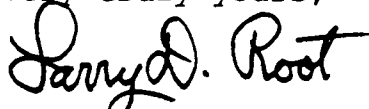
2. Corrective action to be taken to avoid further noncompliance:

All corrective actions listed above have been completed. No further corrective action is necessary.

3. Date when full compliance will be achieved:

Full compliance was achieved on April 10, 1980 when the leak rate test on the valves in question was completed. The valves were permanently added to STP 47A005 by procedure change on September 15, 1980. An informal check was made during the 1980 refueling outage to determine if all valves required to be tested were included in the STP. At that time MOV 2290A and MOV 2290B were identified as not being in the test procedure and appropriate temporary procedure changes were made. More recently a verification check was made as described in response to question number 1 and the results documented by memo to the Inspection Report File. This action was completed on October 21, 1980.

Very truly yours,



Larry D. Root  
Assistant Vice President  
Nuclear Generation

LDR/JVS/pl

cc: Director, Office of Inspection and Enforcement  
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