

Iowa Electric Light and Power Company

October 28, 1981
LDR-81-311

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 81-17

File: A-102, NRC-4, Inspection Report 81-17

Dear Mr. Keppler:

This letter is in response to Mr. Norelius' letter of September 28, 1981 concerning an inspection of activities conducted at the Duane Arnold Energy Center conducted on September 1-2, 1981. The following response indicates the actions which have been taken or will be taken to correct the item of noncompliance noted in the subject Inspection Report.

Violation

10 CFR 50, Appendix B, Criterion V states in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

DAEC Quality Directive No. 1306.1, Revision 1, "Document Control," states in part that "those participating in an activity shall be made aware of and use proper and current instruction, procedures, and drawings ..." and that "...all documents shall be controlled as necessary to preclude the use of outdated or inappropriate documents.

Contrary to the above, an outdated copy of Surveillance Test Procedure No. 43D001 was used on July 7, 1981 to determine the reactivity anomaly for Cycle 6 after one effective full power month of operation.

This is a Severity Level VI violation (Supplement I).

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Response

1. Corrective action taken and the results achieved:

The procedure in question, STP 43D001, was corrected the same day (September 2) this problem was identified. In addition, the test was reperformed on September 2 with satisfactory results.

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

The surveillance manual was modified to include a note in the master surveillance schedule which indicates STP 43D001 must be revised at the beginning of each operating cycle to include a revised reactivity anomalies curve. This note serves as a reminder that a revised curve must be placed in the STP after each refueling outage.

3. Date when full compliance will be achieved:

Full compliance was achieved on September 2, 1981 when STP 43D001 was revised to include the correct reactivity anomalies curve. The modification to the surveillance manual has been completed.

This response is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By Larry D. Root
Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/DWT/p1

Subscribed and sworn to before me on this 28th day of October, 1981.

Kathleen M. Herber
Notary Public in and for the State of Iowa

cc: Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
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