

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9104030258      DOC. DATE: 91/03/29      NOTARIZED: NO      DOCKET #  
FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow      05000331  
AUTH. NAME      AUTHOR AFFILIATION  
MINECK, D.L.      Iowa Electric Light & Power Co.  
RECIP. NAME      RECIPIENT AFFILIATION  
DAVIS, A.B.      Region 3 (Post 820201)

SUBJECT: Responds to violations noted in Insp Rept 50-331/91-03.  
Corrective actions: quarterly repts to mgt will clearly  
identify status of industry operating experience reviews &  
flag significant time delays & target review period defined.

DISTRIBUTION CODE: IE01D      COPIES RECEIVED: LTR 1 ENCL 1 / SIZE: 3  
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

### NOTES:

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	DEDRO	1 1	NRR MORISSEAU, D	1 1
	NRR SHANKMAN, S	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/OEAB	1 1	NRR/DREP/PEPB9D	1 1
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	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
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EXTERNAL:	EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24

Iowa Electric Light and Power Company

March 29, 1991  
NG-91-0609

Mr. A. Bert Davis  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License DPR-49  
Response to Notice of Violation  
Transmitted with NRC Inspection  
Report 91003

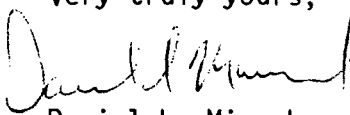
File: A-102, A-103

Dear Mr. Davis:

This letter and attachment are provided in response to the Notice of Violation concerning certain activities at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact our office.

Very truly yours,



Daniel L. Mineck  
Manager, Nuclear Division

DLM/SC/pwj

Attachment: 1) Response to Notice of Violation

cc: U. S. NRC Document Control Desk (Original)  
L. Liu  
L. Root  
R. McGaughy  
S. P. Sands (NRR)  
NRC Resident Inspector - DAEC  
Commitment Control No. 910047

TEC 11

Iowa Electric Light and Power Company  
Response to Notice of Violation  
Transmitted with Inspection Report 91-003

NRC NOTICE OF VIOLATION

10 CFR 50, Appendix B, Criterion XVI, as implemented by the Iowa Electric Light and Power Company Quality Assurance Manual, requires measures to be established to assure that conditions adverse to quality, such as failures, malfunctions, defective material, and equipment are promptly identified and corrected.

Contrary to the above, the licensee failed to take adequate corrective action to fix inaccuracies with feedwater flow instrumentation which is a primary input to thermal power calculations and subsequently APRM calibrations. Although the licensee had 1988 vendor information highlighting feedwater transmitter inaccuracies, and transmitter calibration records showing a trend of feedwater flow transmitter drift, the licensee did not take adequate action to compensate for these problems.

This is a Severity Level IV Violation (Supplement 1)

RESPONSE TO NOTICE OF VIOLATION

a. Corrective Actions Taken and the Results Achieved:

On February 12, 1991 the two feedwater flow transmitters were recalibrated to include a span correction for high line pressure as recommended by the vendor. On February 14, the control room staff detected further drifting on feedwater flow transmitter FT-1581. FT-1581 was recalibrated and on February 15, the plant voluntarily reduced power until replacement transmitters could be installed. From February 16 until March 11 the flow transmitters were monitored for evidence of further drifting using independent indications. On March 7, the flow transmitters and a power supply for flow transmitter FT-1581 were replaced. On March 11, the plant returned to full power.

The review of the vendor service bulletin on feedwater flow inaccuracies and the implementation of recommended corrective actions to the flow transmitters have been completed.

b. Corrective Actions to be Taken to Prevent Recurrence:

We agree with your assessment that the period of twenty-nine months that elapsed between receipt of the vendor information regarding feedwater flow inaccuracies and the implementation of its recommended actions was unacceptable. While this class of document is tracked by our commitment control system for review, we currently have no administrative time limits for the completion of such reviews. To prevent the recurrence of such delays we will strengthen our procedures in the following ways:

- 1) A target review period for each class of document will be defined. For example, General Electric Service Information Letters (SILs) now have a target evaluation period of ninety days. Conditions for which the review period may be extended will be defined.
- 2) Quarterly reports to management will clearly identify the status of industry operating experience reviews and flag significant time delays. An initial quarterly report has already been generated.

Procedural changes incorporating these items shall be developed by May 31, 1991.

We have begun to periodically check the feedwater flow indication through independent means. This is being done by monitoring local feedwater indications or by comparing indicated feedwater flow to main turbine first stage pressure.

We are also in the process of implementing a comprehensive plant trending program. Administrative controls for this program were issued on March 8, 1991. Implementation of the program will be on going through 1991. A subset of this program involves trending the performance of bistable instruments required by the plant Technical Specifications. We have added instruments associated with the feedwater flow indication to this instrument trending program and have begun trending them.

c. Date When Full Compliance Will be Achieved:

Full compliance was achieved on February 16, 1991 when the newly installed feedwater flow transmitters were recalibrated with the recommended adjustments outlined in the vendor documentation.