

NOTICE OF VIOLATION

Iowa Electric Light and Power Company  
Duane Arnold Energy Center

Docket No. 331  
License No. DPR-49

As a result of the inspection conducted on February 4 through March 8, 1991, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1990), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XI, as implemented by the Iowa Electric Light and Power Quality Assurance Manual, requires that tests incorporate the acceptance limits contained in applicable design documents and that test results be documented and evaluated to assure that test requirements have been satisfied.

Drawing No. BECH-M404(24), the design document for standby diesel generator (SDG) fuel quantity level switch settings, requires that day tank low-low alarm level indicating switch Nos. LIS 3207 and LIS 3209 be set to trip at 15 inches of fuel oil (INFO). Also, the calibration data sheets require that SDG day tank level indicating switch Nos. LIS 3208, LIS 3210, LIS 3215, and LIS 3216 be set at  $20 \pm 1.2$ ,  $20 \pm 0.3$ ,  $18 \pm 1.2$ , and  $18 \pm 0.3$  INFO, respectively.

Contrary to the above:

- a. During instrument calibrations in October 1989 and April 1990, switch No. LIS 3208 was set at 25.4 INFO, switch No. LIS 3210 was set at 19.6 INFO, switch No. LIS 3215 was set at 20.5 INFO, and switch No. LIS 3216 was set at 18.6 INFO, which exceeded the calibration tolerance. No evaluation had been performed by the licensee to determine the acceptability of this condition.
- b. During July 1990, the licensee set switch Nos. LIS 3207 and LIS 3209 to trip at 6.86 INFO and 4.0 INFO, respectively.

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

2. 10 CFR 50, Appendix B, Criterion V, as implemented by the Iowa Electric Light and Power Quality Assurance Manual, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings. It also requires that instructions, procedures, or drawings include appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished.

SDG fuel oil day tank annunciator response procedure (ARP) Nos. 1C08A/B10, 1C08B/B-3, 1C93/B-5, and 1C94/B-5 were required to reflect setpoints of 15 INFO, 15 INFO, 18 INFO, and 18 INFO, respectively, as specified on day tank level setting drawing No. BECH-M404(24).

Procedure No. M-11A-TP, "Overcurrent Relay Test Procedure," Revision 3, established the testing methodology for calibrating overcurrent relays. The setting sheets associated with feeder breaker No. 152-301 required a relay tap setting of 5 Amperes.

Drawing No. E893<097> required 10 Ampere fuses to be installed in positions 52-3401-F1 and 52-3401-F2 of remote shutdown panel No. 1C422C. Advanced information drawing (AID) No. APED-H11-067(2) required 10 Ampere fuses to be installed in positions FF-F19 and FF-F20 of control room panel No. 1C03.

Contrary to the above:

- a. Prior to March 1991, the ARP No. 1C08A/B-10 setpoint was 10 INFO, the ARP No. 1C08B/B-3 setpoint was 10 INFO, the ARP No. 1C93/B-5 setpoint was 13 INFO, and the ARP No. 1C94/B-5 setpoint was 13 INFO, which did not reflect the level settings specified on design drawing No. BECH-M404(24).
- b. Procedure No. M-11A-TP did not ensure that the overcurrent relay for feeder breaker No. 152-301 was returned to the required tap setting after calibration. Consequently, the relay tap setting was found to be set at 2 amperes instead of the required setting of 5 amperes.
- c. On March 7, 1991, fuse Nos. 52-3401-F1 and 52-3401-F2 in the remote shutdown panel were observed to be 6 Amperes and fuse Nos. FF-F19 and FF-F20 in control room panel No. 1C03 were observed to be 5 Amperes.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

*April 15, 1991*  
Dated

*H. J. Miller*  
H. J. Miller, Director  
Division of Reactor Safety