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 AUTH. NAME: RANZ, J. F. AUTHOR AFFILIATION: Iowa Electric Light & Power Co.
 RECIP. NAME: DAVIS, A. B. RECIPIENT AFFILIATION: Region 3 (Post 820201)

SUBJECT: Responds to violations noted in Insp Rept 50-331/92-13.
 Corrective actions: new procedure written to govern calibr
 of recorders used for time response measurements against
 natl std & caution re completion of documentation added.

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Iowa Electric Light and Power Company

August 7, 1992
NG-92-3465

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

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

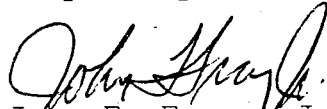
Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to a Notice of Violation
Transmitted with Inspection Report 92013
File: A-105

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 my office.

Very truly yours,



John F. Franz, Jr.
Vice President, Nuclear

JFF/TS/pjv~

Attachment: Reply to a Notice of Violation Transmitted with
Inspection Report 92013

cc: U. S. NRC Document Control Desk (Original)
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L. Liu
L. Root
R. McGaughy
C. Shiraki (NRC-NRR)
NRC Resident Office-DAEC
DCRC

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PDR ADOCK 05000331
Q PDR

IOWA ELECTRIC LIGHT AND POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
TRANSMITTED WITH INSPECTION REPORT 92013

VIOLATION

10 CFR 50, Appendix B, Criterion XII, Control of Measuring and Test Equipment, requires that measuring devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits. Iowa Electric Quality Assurance Manual Section 11.8.3 requires that calibrations of measuring and test equipment shall be calibrated against certified equipment having documented traceability to nationally recognized standards or a basis for calibration, if no national standard exists.

Contrary to the above, on April 29, 1992, the licensee failed to calibrate the recorder used for scram time testing, during the performance of surveillance test procedure 43D002 "Scram Insertion Time Test", against an existing national standard.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO VIOLATION

1. Reason for the Violation

The brush recorders at the Duane Arnold Energy Center (DAEC) are used primarily for routine equipment monitoring and troubleshooting where calibration to a national standard is unnecessary and, therefore, they are not included in the Measuring and Test Equipment (M&TE) program. The Surveillance Test Procedure in question (STP 43D002) did not specifically require the calibration of the recorder against a national standard. The brush recorders were, instead, checked against 60 cycle house current (which fluctuates only ± 0.03 hertz) as the standard before and after the surveillance and the calibration due date on the STP was marked N/A (not applicable).

2. The Corrective Steps That Have Been Taken and the Results Achieved

Upon questioning by the resident inspector, the recorder was calibrated against a signal traceable to a national standard. No adjustment was necessary.

A task force was convened to address the questions raised by the NRC resident inspectors. The task force

consisted of members of the following groups: Licensing, Instrumentation and Controls (I&C) Engineering, I&C Technicians, Surveillance and Testing, Maintenance Engineering and M&TE. As a result of the task force review, the following actions were taken:

- A new procedure was written which will govern calibration of recorders used for time response measurements against a national standard (GMP-INST-012).
- An Engineering Evaluation of the variation of the 60 hertz line frequency and its effect on the accuracy of the recorder was performed. We determined that the inaccuracies associated with changes in line frequency would not have an adverse effect on the readings obtained through the STPs. Specifically, the largest inaccuracy allowed by the STPs would equate to a frequency change of 1.74 hertz. A line frequency deviation of that magnitude is not expected as normal line frequency fluctuates only ± 0.03 hertz.
- Other STP's that require the use of recorders for time response measurements were identified and reviewed. Seven additional STP's were identified.
- The review observed that one STP already referred to a procedure in which there is an instruction to calibrate the recorder to be used. This procedure was revised to more specifically require calibration against a nationally recognized standard.
- One STP was revised to require the use of a calibrated solid state timer; use of a recorder is no longer permitted.
- STP 43D002 and the remaining five STP's were changed to direct the use of the newly written procedure, GMP-INST-012, to calibrate the recorder.

3. The Corrective Steps That Will be Taken to Avoid Further Violations

An assessment will be performed to identify any equipment which is used to take quantitative measurements for acceptance criteria but is not in the M&TE program. This assessment will be complete by

October 31, 1992.

We are also reviewing the maintenance apprenticeship training program to verify that adequate instructions are given on the requirements for completing documentation. A caution on the use of N/A (not applicable) will be added to the training. Any necessary changes in the training will be complete by January 1, 1993. Also, a description of this violation will be included in maintenance continuing training during the month of August 1992.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved upon the completion of the procedure changes, August 5, 1992.