## NOTICE OF VIOLATION

Iowa Electric Light and Power Company Duane Arnold Energy Center

Docket No. 50-331 License No. DPR-49

During an NRC inspection conducted on September 1 through October 21, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violations are listed below:

- Technical Specification 6.8.1 requires, in part, that written procedures covering areas of normal startup, operation, and shutdown of systems and components of the facility, and emergency and off-normal condition procedures be implemented and maintained.
  - a. Integrated Plant Operating Instruction 2, "Startup," Section 4.3, step (17); Operating Instruction 563, "Hydrogen Water Chemistry," Section 3.4.; and Plant Chemistry Procedure 7.26 requires that the offgas oxygen analyzers be placed in service when Hydrogen Water Chemistry was placed in service.
    - Contrary to the above, between the period of April 24, 1992, and September 2, 1992, the offgas oxygen analyzers were not placed in service when Hydrogen Water Chemistry was placed in service.
  - b. Surveillance test procedure (STP) 42B015, "ECCS Trip System Bus Power Monitors Monthly Functional Test," step 7.2.1, requires that breaker 1D23 Circuit 7 be opened.
    - Contrary to the above, on September 10, 1992, during the performance of STP 42B015, step 7.2.1, operators opened breaker 1D21 Circuit 7 instead of breaker ID23 Circuit 7.
  - c. Contrary to the above, Annunciator Response Procedure (ARP) 1C08B D7, "MCC 1B44A TIE Breaker 1B4401 Trip," revision 5, was incorrectly maintained in that it listed loss of power to breaker 1D23 Circuit 7 as a probable cause for the annunciator instead of the correct breaker, 1D21 Circuit 7, and did not direct operators to reset the bell alarm lockout push button prior to restoration of the normal swing bus lineup, which was necessary to prevent loss of the swing bus.

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

2. Technical Specification 4.6.G.2 requires, in part, that inservice testing (IST) of American Society of Mechanical Engineers (ASME) valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50, Section 50.55a(g). The ASME Boiler and Pressure Vessel Code 1980 Edition, Section XI, Article 3417, "Corrective Action," requires an increased testing frequency of once each month until corrective action is taken for power operated valves with full-stroke times less than

10 seconds exhibiting an increase in stroke time of 50 percent or more from the previous test. Reactor Core Isolation Cooling (RCIC) system pump minimum flow bypass valve MO-2510 is part of the IST program at the Duane Arnold Energy Center and has a stroke time of less than 10 seconds.

Contrary to the above, RCIC system pump minimum flow bypass valve MO-2510 was not tested from the period July 8, 1992, until August 25, 1992, (48 days) even though during testing on July 8, 1992, it exhibited an increase in stroke time of greater than 50 percent from the previous test conducted on April 26, 1992.

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

Pursuant to the provisions of 10 CFR 2.201, Duane Arnold Energy Center is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, and a copy to the NRC Resident Inspector at the Duane Arnold Energy Center within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois this 10th day of Movember 1992

L. Robert Greger, Chief Reactor Projects Branch 3