TERA 51-231-

Iowa Electric Light and Power Company

July 23, 1980 LDR-80-202

LARRY D. ROOT ASSISTANT VICE PRESIDENT NUCLEAR GENERATION

Mr. James G. Keppler Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137

> Re: Duane Arnold Energy Center

IE Bulletin 80-17 Failure of Control Subject:

Rods to Fully Insert During a SCRAM

at a BWR

Supplemental Report #2

File: A-10la, NRC-2, Bulletin 80-17

Dear Mr. Keppler:

In partial response to your letter transmitting the subject bulletin concerning the manual SCRAM failure event at TVA's Browns Ferry No. 3, we have completed the Licensee Action Items 2,3,6.a) and 8, activities at DAEC. These activities include the manual and automatic reactor SCRAM testing, verification that the SDV vent lines are functional and that there is no significant amount of water in the SDV, and preparing a procedure to implement the prompt notification requirement discussed in the bulletin. The following discussion is provided to briefly describe the actions taken at DAEC to address these NRC IE bulletin concerns.

DAEC satisfactorily completed the manual and BULLETIN ITEM 2. automatic SCRAM testing on July 12, 1980. The data requested by Items 2.a) through 2.j) was obtained and both of the SCRAM test procedures (Special Test Procedure #80, Rev. 1, SCRAM And Related Systems Operability Verification Test) are available for NRC inspection at DAEC upon request.

During the SCRAM testing, the SDV drain valve was found to be leaking excessively. Investigation revealed that the drain valve had not been properly

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Mr. James G. Keppler Page 2 July 23, 1980

installed during construction (Refer to LER 80-028 for further detailed information). This problem had no adverse affect on the SCRAM function or on completion of the Bulletin Item 2 SCRAM testing. The SDV drain valve installation problem has been subsequently corrected, the SDV has been satisfactorily hydrostatically tested, and the drain valve has been functionally tested satisfactorily.

The control rod SCRAM time testing and SDV fill and drain down times were compared to previously obtained plant data as requested by Item 2.k.

The control rod SCRAM times measured during the July 12, 1980 SCRAM testing very nearly duplicated the individual control rod SCRAM times obtained during testing previously performed in April, 1980. The SDV fill rates were approximately the same as fill rates calculated from data obtained during the April 23 and 26, 1980 reactor SCRAMs. The SDV drain down rates were somewhat slower than the drain down rates calculated from data obtained during the April 23 and 26, 1980 reactor SCRAMs.

- BULLETIN ITEM 3. Subsequent to the July 12, 1980 SCRAM tests, DAEC has satisfactorily performed a surveillance test procedure (BS-6, SCRAM Discharge Volume and Piping Water Test) to verify operability of the SDV vent and drain valves and to verify that there is no significant amount of water in the SDV and associated piping. The testing procedure (BS-6) and results are available for NRC inspection at DAEC upon request.
- BULLETIN ITEM 6.a). In order to comply with the 24 hour prompt notification requirement, an OPERATING ORDER has been issued requiring the Shift Supervising Engineer to notify the NRC Operations Center in Bethesda, Md. via the emergency notification system "red phone" any time the HPCI, RCIC, SLCS, RPT/RHR/pool cooling, or main steam bypass system is less than fully operable and when it is restored to full operability. The OPERATING ORDER notes that surveillance tests and preventive maintenance less than 24 hours need not be reported as allowed in the subject IE bulletin.
- BULLETIN ITEM 8. The contents of this letter in conjunction with the previously submitted correspondence of July 9, 1980 and July 17, 1980 concerning the subject bulletin, fulfill the DAEC Item 8. reporting requirements.

If you have any questions or desire further information concerning this matter, please contact this office.

Mr. James G. Keppler Page 3 July 23, 1980

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

IOWA ELECTRIC LIGHT AND POWER COMPANY

Bv:

Larry D. Root

Assistant Vice President

Nuclear Generation

LDR/DWT/pl.

Subscribed and sworn to before me on this 2

25th day of

Notary Public in and for the

JEAN R. SMITH My Commission Expires

September 30, 1981

State of Iowa

Docket No. 50-0331

cc: U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, D. C. 20555

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