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SUBJECT: Responds to NRC concerns raised at 910308 exit meeting following completion of EDSFI re non-Tech Spec instrument calibrs, breaker setting left at value different from value required by procedures & control circuit fuses.

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Iowa Electric Light and Power Company

March 29, 1991

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FILE *[initials]*

Mr. Thomas Martin  
 Acting Director, Division of Reactor Safety  
 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  
 NRC Concerns Regarding the EDSFI  
 File: A-103

Dear Mr. Martin:

This is with reference to the exit meeting at the Duane Arnold Energy Center (DAEC) on March 8, 1991, following completion of the NRC's Electrical Distribution System Functional Inspection (EDSFI) and our related discussions.

Iowa Electric (IE) appreciates the timely advice of NRC's findings on the results of the EDSFI and had hoped to meet with you to discuss further our understanding of the matters identified in the inspection and your perceptions of and comments regarding its results. We regret, but understand, that considerations of timing prevented our meeting; accordingly, we thought it would be helpful to record our views for your consideration.

The NRC team which conducted the EDSFI consisted of six persons from Region III and three NRC contractor employees. The team spent three weeks at the DAEC site over a period of five weeks. The purposes of the inspection were to evaluate the functionality of the electrical distribution system and the quality of IE's engineering and technical support for that system.

It is our understanding that the team found the DAEC electrical distribution system to be functional and concluded that the quality of the engineering and technical support for that system is acceptable. The team noted strengths in the areas of quality, dedication, and professionalism of personnel; openness of communications with NRC; plant housekeeping; and the surveillance testing program. Consistent with these conclusions, IE believes that the electrical systems at the DAEC are soundly designed; possess safety margins, redundancy, and diversity; and are maintained in an appropriate mode of readiness to perform their safety functions.

Three matters were identified as possible violations: (1) non-Technical Specification instrumentation calibrations, (2) one instance of a breaker setting being left at a value different than that required by procedures, and (3) configuration control regarding control circuit fuses. In addition, there

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were potential unresolved items, open items, and weaknesses identified by the EDSFI team.

I can assure you that each matter identified in the inspection will be rigorously evaluated and addressed by IE. To a large extent, the issues noted during the EDSFI had been previously identified by IE through various mechanisms including internal self-assessment activities, observations by management and senior technical personnel, review of reports of EDSFIs at other facilities, NRC inspections at DAEC, and industry operating experience. IE has developed plans for addressing and resolving these problems. For high priority matters, programs are completed or well along in implementation. At the meeting on December 12, 1990, IE advised Region III and NRR of the problems we had identified and a schedule (as then developed) for addressing them.

We have carefully reviewed reports on EDSFIs conducted at other nuclear power plants. Although we do not rely solely on comparative analyses to assess our strengths and weaknesses, our review shows that the issues identified at the DAEC appear to be fewer in number and of less significance than those identified at other facilities.

Against this background, I am concerned by certain views which I understood you to convey in connection with the meeting and discussions referred to above regarding the implications of the EDSFI results. In particular, if my impression is correct, it may be NRC's view that the EDSFI findings are, in some way, pervasive, extraordinary or far reaching. The results, of course, speak for themselves but, as noted above, a careful review of other EDSFIs would not confirm that impression.

Further, the results of the EDSFI as communicated at the exit meeting and during the inspection do not support a generalized adverse judgment which was expressed regarding the progress, quality, or effectiveness of the IE engineering organization. We fully appreciate that there is significant opportunity for improvement in engineering activities. However, important changes have been made this year, not all of which may have been communicated to NRC. For example, the Power Systems Analysis project involves detailed analysis of DC and AC distribution systems, station batteries and emergency diesel generator systems and an integrated plant analysis. This project is well underway and substantial elements of it will be completed by July 1991. Another example is the program to re-assemble the design bases and design basis documents for the DAEC. The Configuration Management group of Design Engineering is responsible for this effort; Phase I (involving the Emergency Core Cooling System and other safety-related systems) is on schedule with four systems complete and seven others nearing completion. Finally, authorized professional staffing in Design Engineering has increased by 53 permanent IE-employee positions since December 1990. A comprehensive description of organizational changes, technical accomplishments, and staffing achievements will be found in the summary of our activities during the current SALP-9 period which should be in the hands of the Region III staff in the next few days. We believe you will find this information helpful in balancing any conclusions which might be extrapolated from the EDSFI regarding the DAEC engineering program.

I hope that this summary submitted for your consideration is helpful. As I have indicated, we would, of course, be pleased to meet with you to discuss any of these matters or to answer any questions you may have in this regard. In particular, we believe that further discussion of the EDSFI results and the

specific aspects thereof which gave rise to the more general concerns addressed above would be mutually beneficial.

Very truly yours,



Daniel L. Mineck  
Manager, Nuclear Division

DLM/PMB/pjv+

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