

CATEGORY 1

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SUBJECT: Forwards response to NRC ltr re violations noted in insp
rept 50-331/96-04.C/A:on 960517 action request 960844 was
initiated to address to inspector concern.

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John F. Franz, Jr.
Vice President, Nuclear

July 29, 1996
NG-96-1525

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D.C. 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to a Notice of Violation Transmitted with Inspection Report 96004
File: A-105, A-102

Dear Sir:

This letter and attachment are provided in response to the Notice of Violation transmitted with NRC Inspection Report 96004.

This letter contains no new commitments.

If you have any questions regarding this matter, please contact my office.

Sincerely,

John F. Franz
Vice President, Nuclear

Attachment: Reply to a Notice of Violation Transmitted with Inspection Report 96004

cc: R. Murrell
L. Liu
G. Kelly (NRC-NRR)
H. Miller (Region III)
NRC Resident Office
DOCU

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**IES Utilities Inc.
Reply to a Notice of Violation
Transmitted with Inspection Report 96004**

VIOLATION

Technical Specification (TS) 6.8.1 requires that written procedures covering areas such as corrective maintenance be implemented. Maintenance Directive (MD) 020, "Maintenance Planning," Revision 25, specifies that the Operations Shift Supervisor (OSS) is responsible for determining the effect of the maintenance on the plant and any other requirements or special conditions (like TS requirements) that are required for the maintenance to occur.

Contrary to the above, on May 17, 1996, the inspectors identified that the OSS failed to determine that a TS limiting condition for operation (LCO) was necessary for the May 15, 1996, maintenance on a drywell pressure monitor. The inspectors identified that TS Table 3.2-H, Action Statement 93 specified a 30 day LCO with the drywell pressure monitor inoperable.

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

RESPONSE TO VIOLATION

1. REASON FOR THE VIOLATION

On March 19, 1996, it was determined that the recorder indication provided by Pressure Recorder (PR) 4398A was operable but slowly degrading. A Corrective Maintenance Action Request (CMAR) was initiated to resolve the concern. As part of the planning of this CMAR (in accordance with the appropriate Maintenance Directive), the plant effect section of the CMAR was annotated to indicate that a 30 day LCO was required in accordance with TS table 3.2-H Action Statement 93. Action Statement 93 states:

If the number of OPERABLE channels (both indicator and recorder inoperable) is reduced to one channel, follow either step (a) or (b) below.

- a. Operation may continue for the next 30 days provided at least one (1) channel of instrumentation specified in Table 3.2-F for the identical parameter is OPERABLE** or follow step (c) below.*
- b. Restore the inoperable channel to OPERABLE status within 7 days, should neither channel of instrumentation specified in Table 3.2-F for the identical parameter be OPERABLE, or follow step (c) below.*



- c. *Within the following 12 hours be in at least HOT STANDBY and within the next 24 hours be in COLD SHUTDOWN.*

On May 15, 1996, the CMAR was released for work. PR4398A provides both digital indication and recorder indication for wide-range drywell pressure indication to meet the requirements of Reg. Guide 1.97 (0-250 psig). Additional wide range drywell pressure indication is supplied in the control room by Pressure Indicator (PI) 4396C. PI4396C has a range of 0-100 psig. When PR4398A was removed from service, the OSS determined that PI4396C was the indication that fulfilled the requirements of the LCO statement and therefore, didn't enter the 30 day action statement.

2. **CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED**

On May 17, 1996, Action Request 960844 was initiated to address the inspector's concern. PR4398A was verified to be operable. It was determined that a 30 day LCO was required when the PR was removed from service. The total period the recorder was out of service was less than one day.

Training was held with all Licensed Operators on the need to enter an LCO when PR4398A is removed from service and that PI4396C is not the indicator noted in Action Statement 93. Additionally, Licensed Operators will be trained during the Licensed Operator Requalification program on the unique ranges of accident range instruments in our TS tables.

3. **CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

No further corrective actions are necessary.

4. **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance was achieved on May 17, 1996, when PR4398A was verified to be operable.