

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-331/82-08(DPRP)

Docket No. 50-331

License No. DPR-49

Licensee: Iowa Electric Light and Power Company
Post Office Box 351
Cedar Rapids, IA 52406

Facility Name: Duane Arnold Energy Center

Inspection At: Duane Arnold Site, Palo, IA

Inspection Conducted: July 1-31, 1982

Inspectors: *R. D. Walker for*
L.S. Clardy

8-27-82

Approved By: *R. D. Walker*
R. D. Walker, Chief
Projects Section 2A

8-27-82

Inspection Summary

Inspection on July 1 - 31, 1982 (Report No. 50-331/82-08(DPRP))

Areas Inspected: Routine resident inspection of Followup on Previously Identified Item; Operational Safety Verification; Monthly Maintenance Observation; Monthly Surveillance Observation; Independent Inspection; TMI items; and the July 28, 1982 Emergency Drill. The inspection involved a total of 103 inspector-hours onsite by one NRC inspector including 29 inspector-hours onsite by one inspector during off-shifts.

Results: Of the six areas inspected, no items of noncompliance or deviations were identified in five areas. One item of noncompliance was identified in one area (failure to follow audit procedures - Paragraph 7).

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DETAILS

1. Persons Contacted

- *D. Mineck, Plant Superintendent, Nuclear
- D. Wilson, Assistant Plant Superintendent, Rad Protection/Security
- J. Vinquist, Assistant Plant Superintendent, Technical Support
- *B. York, Assistant Plant Superintendent, Operations
- C. Mick, Assistant Operations Supervisor
- K. Young, Radiation Protection Supervisor
- *E. Matthews, Corporate Quality Assurance Manager
- *D. Dains, Fire Marshall

In addition, the inspector interviewed several other licensee personnel including shift supervising engineers, control room operators, engineering personnel, administrative personnel and contractor personnel (representing the licensee).

*Denotes those contacted at the exit interviews.

2. Followup on Previously Identified Item

The inspector reviewed the following item to verify that the licensee's response and actions taken were in accordance with regulatory requirements, technical specifications, approved procedures, and accepted industry standards. The inspector also verified that the response and actions were done in a timely manner, and were in accordance with previously made commitments.

(Open) Open Item (331/82-07-03): Bullet Resistant Fire Doors. The initial vendor supplied documentation for fire protection rating of the doors was not acceptable. The licensee has instituted interim compensatory measures pending resolution of the doors fire protection rating.

3. Operational Safety Verification

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the month of July. The inspector verified the operability of selected emergency systems, reviewed tagout records and verified proper return to service of affected components. Tours of the reactor building and turbine building were conducted to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibrations and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan.

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the month of July, the inspector walked down the accessible portions of the Residual Heat Removal system to verify operability.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under technical specifications, 10 CFR, and administrative procedures.

No items of noncompliance or deviations were identified.

4. Monthly Maintenance Observation

Station maintenance activities of safety related systems and components listed below were observed/reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with technical specifications.

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented.

Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety related equipment maintenance which may affect system performance.

The following maintenance activities were observed/reviewed:

MSIV Refurbishment
MSIV Actuator Repair
MSIV Local Leak Rate Testing

Following completion of maintenance on the Main Steam System, the inspector verified that the system had been returned to service properly.

No items of noncompliance or deviations were identified.

5. Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the Reactor Core Isolation Cooling System and Diesel Generators and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished, that test results conformed with technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

No items of noncompliance or deviations were identified.

6. TMI Related Items

The inspector reviewed the following TMI items for development and implementation per NUREG-0737, and licensee commitments.

a. Minimum Shift Crew, Items 1.a.1 3.2 (Open)

The licensee has not received the examination results from licensing. The licenses should be received and requirements met by September 1, 1982.

b. Common Reference Level, Item II.k.3.27 (Open)

NRR concurs with the licensee's proposed modifications. Installation will be performed at the next refueling outage.

c. Reactor Coolant System Vents, Item 11.B.1 (Open)

NRR is evaluating the licensee's response.

No items of noncompliance or deviations were identified.

7. Independent Inspection Effort

During a review of Administrative Control Procedure 1406.2, Maintenance Procedures, the inspector noted the revision was dated November 19, 1980, but was not signed off and implemented until April 12, 1982. Further inspection revealed the revision was a result of an Iowa Electric Internal Maintenance Audit I-80-22 in October 1980. The audit revealed in two instances Iowa Electric was in violation of their procedures. The corrective actions response to the audit findings (Document Change Form 2913, dated November 24, 1980) was the requirement had been deleted and/or modified. As a result of the audit reply, quality assurance closed the item on December 4, 1980. In the interim 16 months, the requirements were still in Administrative Control Procedure 1406.2 and DAEC was not complying with its procedures.

It is the inspector's opinion that 16 months is too long to have a Document Change remain unissued. Periodic reviews of the Document Change Log should also have raised questions about why it was not issued.

A subsequent audit of the same area, I-81-23 performed in October 1981, stated that all previous audit findings in this area were closed satisfactorily. However, the audit re-identified one finding identical to a procedural violation identified in I-80-22. The finding on I-81-23 was not flagged by the audit as repetitive, uncorrected or identified as such by the audited organizations response. The proposed corrective actions response was different than the response for I-80-22. This corrective action was not accomplished prior to the original corrective action being implemented.

10 CFR 50, Appendix B, Criterion XVIII, Audits, states in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with the quality assurance program...followup action, including re-audit of deficient areas, shall be taken where indicated." The licensee is also committed to ANSI N45.2.12. This standard, Section 4.5 states, in part, "The audited organization shall take appropriate action to assure that corrective action is accomplished as scheduled." Quality Assurance Manual 131.1, Revision 2, Audits, Section 5.8 states "Subsequent audits of a given activity shall include those areas found deficient on the previous audit of that activity."

Contrary to the above, audit I-80-22 findings were not adequately followed up on by the audited or auditing organization to ensure corrective actions were taken and subsequent audits did not adequately review the deficient areas. As a result, the licensee was in violation of their procedures for an additional 16 months after the audit.

This is an item of noncompliance (50-331/82-08-01).

The two instances of procedural violation are of minimal consequence, the issues that procedural violations existed and went uncorrected for 16 months, or that audits may not adequately review previous audit areas or ensure corrective actions are accomplished is not. The inspector is aware that improvements have been made in your quality assurance program over the past two years. In your response to this item, please outline the steps taken to assure this is not a recurrent type problem.

8. July 28, 1982 Emergency Drill

The inspector also observed the July 28, 1982, emergency drill and verified that the licensee has a program for correcting identified discrepancies and that equipment disrupted was returned to its proper location after the drill.

No items of noncompliance or deviations were identified.

9. Exit Interview

Due to the length of the inspection and the diversity of the areas inspected, exit interviews were conducted on a weekly basis between the NRC inspector and the appropriate licensee personnel. In each case, the scope and findings of the individual inspection areas were summarized. The licensee acknowledged the item of noncompliance.