

Iowa Electric Light and Power Company

September 9, 1982
LDR-82-256

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 82-07

File: A-102, NRC-4, Inspection Report 82-07

Dear Mr. Keppler:

This letter responds to Mr. Streeter's letter of August 10, 1982, concerning the routine safety inspection conducted at the Duane Arnold Energy Center on June 1 through June 30, 1982. Three items of noncompliance were identified. The following responses describe the actions that have been or will be taken to correct the items of noncompliance.

Violation 1:

"Technical Specification 6.8.1 requires, in part, that procedures be adhered to for normal startup, operation, and shutdown of systems and components of the facility. Duane Arnold Energy Center Operating Instruction 83, Section C.2.2, requires that the outboard MSIVs must be opened, then the pressure equalized across the inboard MSIVs, and then the inboard MSIVs opened.

Contrary to the above, the inboard MSIVs were opened before the outboard MSIVs and without equalizing pressure across the inboard MSIVs. This resulted when an incorrect procedure was used.

This is a severity Level IV violation. (Supplement I)."

Response

1. Corrective action taken and the results achieved:

The use of the "incorrect" procedure during the MSIV opening sequence resulted in the rupture of the hydraulic speed control cylinder on two inboard MSIVs. After detection of this condition by the surveillance program, the plant was shut down in an orderly manner. The inboard MSIVs were disassembled and inspected for any damage that may have resulted from this operation. No damage to the valves was found. The cracked hydraulic cylinders were replaced, the MSIV actuators were rebuilt, and the inboard MSIVs were local leak rate tested with satisfactory results. The plant was then returned to service.

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2. Corrective action taken to preclude recurrence:

The Operators involved were removed from shift for retraining and re-examination. The importance of adherence to procedures was emphasized to all operators. The following additional actions were also taken to help ensure that procedures will be followed correctly in the future. The Administrative Control Procedure which controls the Shift Operation, Organization and Turnover was modified to:

- a) Instruct the operating crew to, during normal circumstances, repeat a direct order back verbatim to the person giving the order prior to execution of the order, and
- b) Instruct operators to challenge any direction given by his superiors if, in the operator's judgement, the direction is imprudent due to existing conditions or fulfillment of the direction creates the potential for violating Technical and/or Environmental Specifications or an approved plant procedure.

The Operations Manual has been modified to require that:

- a) Operations personnel review instructions and familiarize themselves with the intent of the instructions prior to performing planned evolutions,
- b) Procedures which are used in plant operation are reviewed for areas in which they can be improved as the procedures are used, and
- c) The Shift Technical Advisor completes an Operating Procedure/Instruction Review Report during each shift to list those procedures or instructions reviewed and comments for their improvement.

Integrated Plant Operating Instructions have been changed to provide:

- a) A concise reference to the Operating Instruction which gives a detailed, step-by-step sequence for opening the MSIVs, and
- b) An exact sequence for closing all MSIVs upon shutdown, including the panel position of the associated hand switches.

The Operating Instruction which gives the MSIV opening sequence has been amended to provide more detailed instructions for equalizing pressure around the MSIVs.

To detect future MSIV actuator problems the operators have been directed to perform MSIV closure time testing during the startup for those shutdowns that involve closing the MSIVs.

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The reinstruction of personnel will prevent the recurrence of this event. The implementation of the revised procedures will facilitate procedural compliance.

3. Date when full compliance will be achieved:

Full compliance was achieved before the return to power operation on July 26, 1982.

Violation 2:

"Technical Specification 6.8.1 requires, in part, that procedures be adhered to for the surveillance and testing area. Surveillance Test Procedure 42F010, Step 4.12 requires calibration data and calibration certification for PS 4368A and PS 4368B to be attached to the STP. Surveillance Test Procedure 41A006, Step 4.6.e requires V-18-07 to be locked open.

Contrary to the above:

- a. STP 42F010, performed on May 12, 1982 did not have the data or certification attached.
- b. The chain lock was not attached to the pipe following the performance of STP 41A006 on May 16, 1982 after V-18-07 was opened.

This is a Severity Level V violation (Supplement I)."

Response:

Based on the inspection report, no response is required for violation 2.a above.

1. Corrective action taken and results achieved (Item 2.b):

V-18-07, the isolation valve for scram discharge volume level switch LS-1861A, was verified open and properly locked.

2. Corrective action taken to preclude recurrence (Item 2.b):

A permanent foreman has been named to supervise the technicians responsible for locking valves. This supervision will help ensure that procedures are followed. To ensure that sufficient attention is paid to performance and review of surveillance tests, appropriate personnel will be reinstructed. This reinstruction emphasizes the importance of the surveillance program and reminded personnel that adherence to and proper review of surveillance test procedures are the essential cornerstones of the surveillance program.

3. Date when full compliance will be achieved:

Full compliance will be achieved September 15, 1982 when reinstruction will be completed.

Violation 3:

"10 CFR 50, Appendix B Quality Assurance Criteria, Section V. Instructions, Procedures and Drawings, states in part, "Activities affecting quality shall be prescribed by documented instructions ... and shall be accomplished in accordance with these instructions."

- a. Duane Arnold Energy Center Administrative Control Procedure 1404.4, Operating Logs, Section 5.8, states, "The Operations Supervisor shall review and initial the duplicate copies of the Shift Supervising Engineers and Operating Logs. He shall route the duplicate copies to other personnel as may be required for review of entries concerning their area of supervision."

Contrary to the above, the Operations Supervisor did not review the duplicate logs for May 22, 1982.

- b. Duane Arnold Energy Center Administrative Control Procedure 1402.1, "Records Management," Section 4.13 states in part, "The Support Services Supervisor is responsible ... for storing original records in ... a manner to prevent deterioration or damage." Section 5.2 states in part, "For all records ... the retention period shall begin as of the date of the document."

Contrary to the above, the tag out logs for March 1982 cannot be located.

This is a Severity Level V violation (Supplement I)."

Response: (Item 3.a)

1. Corrective action taken and results achieved:

The duplicate logs for May 22, 1982 were reviewed and initialed by the Operations Supervisor.

2. Corrective action taken to preclude recurrence:

To preclude recurrence of this event, Administrative Control Procedure 1404.4 is being modified to:

- a) require review of the logs by the Operations Supervisor on the first working day following the log entries,
- b) address the method and purpose of the Operations Supervisor's review,
- c) require personnel responsible for transporting the duplicate logs from the Operations Supervisor to the Support Services Supervisor verify that the logs have been initialed, and
- d) instruct the Operations Supervisor to name a designate to review the duplicate logs in his absence.

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Additional training on the log review process is being developed and will be implemented.

3. Date when full compliance will be achieved:

Full compliance will be achieved by October 31, 1982 when retraining will be complete.

Response: (Item 3.b)

1. Corrective action taken and results achieved:

The tag out logs for March, 1982 have not been located.

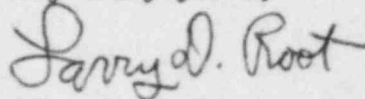
2. Corrective action taken to preclude recurrence:

To prevent recurrence, the Administrative Control Procedure controlling Hold-Off tags is being modified to require documentation of the transfer of Hold-Off logs from Operations to the Support Services Department.

3. Date when full compliance will be achieved:

The change of the Administrative Control Procedure will be achieved by September 30, 1982.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/KLH/p1*

cc: K. Hill
D. Arnold
L. Liu
S. Tuthill
NRC Resident Office
Ref: Commitment Control No. 82-060