

Iowa Electric Light and Power Company

February 28, 1983

NG-83-749

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
OF NUCLEAR DIVISION

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 82-18,  
concerning locked valves

File: A-102, NRC-4, Inspection Report 82-18

Dear Mr. Keppler:

This letter is in response to Mr. J. F. Streeter's letter of January 26, 1983 concerning a routine safety inspection at the Duane Arnold Energy Center conducted October 1 through November 30, 1982. The following response indicates the actions which have been taken to correct the one item of noncompliance noted in the subject Inspection Report.

Item of Noncompliance

Technical Specification 6.8.1 requires, in part, that procedures be adhered to for the surveillance and testing area. Surveillance Test Procedure 41A006, Step 4.6.E requires that valves V-18-07, V-18-08, and V-18-16 be locked in their required position.

Contrary to the above, the chain lock was not attached to the pipe following the performance of STP 41A006 on October 20, 1982, after valves V-18-07, V-18-08, and V-18-16 were properly positioned.

Response

1. Corrective action taken and results achieved:

The valve line-ups were immediately verified and the valves properly locked.

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2. Corrective action taken to avoid further noncompliance:

Prior to this occurrence, a procedural definition of a locked valve was drafted and was subsequently approved by the DAEC Operations Committee. The definition was also reviewed and deemed adequate by the Safety Committee. All surveillance test procedures (STPs) and operating instructions (OIs) which involve safety systems with locked valves are being modified to 1) contain the procedural definition of a locked valve, and 2) provide for independent verification of valve lineup and locked status.

In addition, all personnel having responsibility for maintenance and verification of proper valve locking have been reinstructed as to the correct procedure of locking valves and the necessity for adherence to the method.

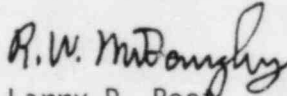
3. Date when full compliance will be achieved:

The definition of a locked valve was approved by the DAEC Operations Committee on September 9, 1982, and reviewed by the Safety Committee on January 28, 1983.

Personnel reinstruction was completed on December 1, 1982.

Modification of all STPs and OIs will be completed prior to startup after the current refueling outage.

Very truly yours,

*for*   
Larry D. Root  
Assistant Vice President  
Nuclear Generation

LDR/DEW/kmf

cc: D. Wittner  
D. Arnold  
L. Liu  
S. Tuthill  
NRC Resident Inspector  
Ref: Commitment Control No. 830003