

September 10, 1982

In reply, please
refer to LAC-8584

DOCKET NO. 50-409

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

SUBJECT: DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR
PROVISIONAL OPERATING LICENSE NO. DPR-45
IE INSPECTION REPORT 50-409/82-07

REFERENCES: (1) NRC Letter, Spessard to Linder,
dated August 12, 1982
(2) DPC Letter, LAC-8338, Linder to Keppler,
dated June 9, 1982

Dear Mr. Keppler:

This letter constitutes the written statement required in reply to the April 22, 1982 and June 1-30, 1982 Inspection Report (Reference 1), which was received August 17, 1982. The Notice of Violation listed two items of noncompliance.

NRC ITEM 1:

Technical Specification 4.2.2.22 requires, in part, that in Operational Conditions 1, 2 or 3 with the gross alpha activity of the coolant $>5.0 \times 10^{-6}$ $\mu\text{Ci}/\text{gram}$, the plant is to be in Operational Condition 3 with the main steam line isolation valve closed within 12 hours and in Operational Condition 4 within the next 24 hours. Technical Specification 3.0.4 states, in part, "Entry into an OPERATIONAL CONDITION or other specified applicability state shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted."

Contrary to the above, on June 4, 1982, with the gross alpha activity of the coolant $>5.0 \times 10^{-6}$ $\mu\text{Ci}/\text{gram}$, the plant was taken from Operational Condition 4 to Operational Condition 2. This action was taken due to a failure of plant personnel to recognize that the alpha activity of a coolant sample was in excess of the Technical Specification action level.

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

DPC RESPONSE:

Corrective Action Taken and Results Achieved

Plant personnel recognized that the alpha activity recorded was in excess of the Technical Specification limit on June 5, 1982. A four hour sampling frequency was initiated in accordance with Technical Specification 4.2.2.22.f. A reactor shutdown was conducted at 0205 on June 5 in accordance with Technical Specification 4.2.2.22.a.3. Refer to Reference 2 for a discussion of the circumstances leading to the increase in alpha activity.

Corrective Action Taken to Avoid Further Noncompliance

All Health and Safety and Operations Department personnel have been informed of this incident to focus their attention on the application of Technical Specification limits for primary system activity and the action requirements if a limit is exceeded. The Technical Specification limits for the primary system activity and chemistry are being entered onto each LACBWR Water Chemical and Radiochemical Analyses Report form prior to initial use. Specification of the limits on the form on which sample results are recorded serves as a constant reminder and easy reference for the technicians. This action should help avoid further noncompliance.

Date Full Compliance Achieved

June 5, 1982

NRC ITEM 2:

Technical Specification 4.2.2.15 states, in part, "Both core spray pumps may be removed from service for maintenance provided that... the Low Pressure Core Spray subsystem is operable."

Contrary to the above, on June 16, 1982, both core spray pumps were removed from service and the Low Pressure Core Spray subsystem was inoperable. This occurred when the control switches for both High Pressure Core Spray Pumps and the Low Pressure Core Spray Automatic Valve which was closed were placed in the "Pull Out" position which rendered those components inoperable because they would not respond automatically to an initiating signal.

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

DPC RESPONSE:

Corrective Action Taken and Results Achieved

These actions were taken in preparation for changing the transmitter for Water Level Safety Channel No. 2 to an NRC required environmentally qualified transmitter during a refueling outage. The Shift Supervisor

directed these actions be taken to prevent unnecessary challenging of a safety system due to generation of a low water level signal during the modification work. When the NRC Resident Inspector questioned the positioning of the control switches, an investigation was conducted, which determined the control switch positioning was not necessary for the work being accomplished at that time.

At 0908 on June 16, the LPCS valve control switch was returned to the "Auto" position, thereby satisfying the requirement of Technical Specification 4.2.2.15. At 0915, the control switches for the HPCS pumps were also returned to "AUTO".

Action Taken to Avoid Further Noncompliance

A copy of each approved facility change is now being routed directly to the Shift Supervisor's Office, in order to better ensure that the duty Shift Supervisor is cognizant of the scope of work being performed. The calibration procedure for Water Level Safety Channels has been revised to specify what actions need to be taken to prevent inadvertent actuation and challenging of safety systems during calibration, while remaining in full compliance with Technical Specification 4.2.2.15. Several Technical Specification test procedures have also been revised for similar reasons. A change to the Technical Specifications covering the High Pressure Core Spray System facilitating the performance of maintenance will be submitted to the Nuclear Regulatory Commission. These actions should help prevent recurrence of a similar event.

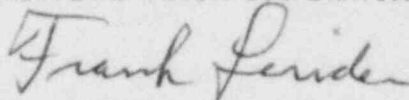
Date Full Compliance Achieved

June 17, 1982

If there are any questions concerning this response, please contact us.

Yours truly,

DAIRYLAND POWER COOPERATIVE



Frank Linder, General Manager

FL:LSG:eme

cc: Resident Inspector