

# IES UTILITIES INC.

John F. Franz, Jr.  
Vice President, Nuclear

December 5, 1994  
NG-94-4212

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-37  
Washington, DC 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 94017  
File: A-105, A-102

Dear Sir:

This letter and attachments are provided in response to the Notice of Violation transmitted with Inspection Report 94017. Additionally, we wish to acknowledge the Staff's concerns, noted in that Inspection Report, regarding risk implications of performing maintenance activities during power operation. We fully recognize the importance of safety system availability as reflected in our overall maintenance and outage planning programs. We will be requesting a meeting with Region III Staff to inform you of how we are addressing this issue and ensure we are meeting NRC's expectations.

This letter contains the following new commitments:

1. The Engineered Maintenance Action (EMA) process will be revised to include verification that documents affecting operability have been reviewed or revised before equipment is declared operable. This action will be completed by February 1, 1995.
2. All EMAs worked during the three months prior to October 21, 1994 (since July 21, 1994), will be reviewed to verify that appropriate plant documents have been updated as necessary. This review will be completed by February 1, 1995.
3. The current process for notifying the Testing and Surveillance and Plant Procedures groups prior to the start of work on an EMA will be reviewed and revised, if necessary, by February 1, 1995.

9412130251 941205  
PDR ADOCK 05000331  
Q PDR

General Office • P.O. Box 351 • Cedar Rapids, Iowa 52406 • 319/398-4411  
An IES INDUSTRIES Company

*J.F.F.*

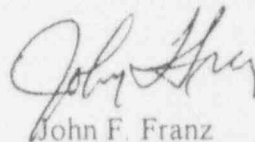
NG-94-4212

Page 2

In addition to the above corrective actions, Engineering has recently completed an assessment of the EMA process. This assessment identified other issues similar to that discussed in the attachment to this letter. Engineering management is currently reviewing the recommendations contained in the assessment report and will implement corrective actions as necessary.

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

Sincerely,



John F. Franz  
Vice President, Nuclear

Attachment: Response to Notice of Violation Transmitted with Inspection Report 94017

cc: R. Murrell  
L. Liu  
L. Root  
G. Kelly (NRC-NRR)  
J. Martin (Region III)  
NRC Resident Office  
DOCU

IES Utilities Inc.  
Reply to A Notice of Violation  
Transmitted with Inspection Report 94017

**VIOLATION**

Technical Specification 6.8.1 specified that written procedures covering areas such as normal operation and off-normal conditions be implemented and maintained.

Contrary to the above, from September 1 to September 30, 1994, one operating instruction and seven annunciator response procedures (off-normal condition procedures) associated with 28 plant area radiation monitors (ARMs) had not been revised to reflect changes made to the ARM alarm setpoints.

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

**RESPONSE TO VIOLATION**

**1. REASON FOR VIOLATION**

On September 30, 1994, seven Annunciator Response Procedures (ARPs) and one Operating Instruction (OI) associated with the upscale alarm setpoints for twenty eight plant Area Radiation Monitors (ARMs) were determined to be incorrect. The ARM setpoints had been changed on September 1, 1994, as part of a design basis review using an Engineered Maintenance Action (EMA). The setpoint changes required changes in one Emergency Operating Procedure (EOP), one OI and seven ARPs. All should have been made effective before the affected equipment was declared operable. In fact, only the EOP was changed.

Duane Arnold Energy Center (DAEC) Administrative Control Procedure (ACP) 1408.10, Engineered Maintenance Action, requires that proposed EMAs be routed to various plant departments (including Plant Procedures and Testing and Surveillance groups) for review and approval prior to EMA installation. As part of this review, any plant procedures that are affected by the proposed EMA are identified on the EMA form. Two weeks prior to the scheduled work start date, the Plant Procedures and Testing and Surveillance groups are normally provided with an EMA notification form which states that the EMA is about to be worked; this is sufficient time to implement any procedure revisions. The notification process is new and, in this case, was ineffective because it was not clear which group was responsible for transmitting the notification forms. Due to the ineffective notification process, the Plant Procedures group was unaware of the scheduled date for EMA installation and therefore, procedure revisions were not completed before the equipment was restored to an operable status.

Following this event, a review of ACP 1408.10 identified that while the EMA procedure requires that procedure changes be identified prior to EMA installation and implemented prior to EMA closure, the affected equipment may be declared operable prior to EMA closure and without evidence that appropriate procedures and/or surveillances have been revised.

2. **CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED**

After the discovery of the concern, the ARPs and the OI were appropriately revised on September 30, 1994.

All EMAs that were in the approval process at the time of this event were reviewed to verify that notification forms were included with those EMAs for which procedures need to be revised. Any package requiring notification forms has had forms attached to the package.

Increased emphasis has been placed on the maintenance planners regarding their responsibilities to attach the notification forms to approved EMAs.

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

Engineering will work with Operations to develop a barrier in the EMA procedure that will provide verification that any affected documents have been revised before equipment is declared operable after EMA work is completed. Additionally, Engineering will review the current process for notifying the Testing and Surveillance and Plant Procedures groups before an EMA is started and revise the process as appropriate. This work will be complete by February 1, 1995.

All EMAs worked during the three months prior to October 21, 1994 (since July 21, 1994), will be reviewed to verify that appropriate plant documents have been updated as necessary. This review will be completed by February 1, 1995.

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

Full compliance was achieved on September 30, 1994 when the ARPs and OI affected by changes in ARM alarm setpoints were revised.