

*Reactor Facilities
Branch*

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

DEC 9 1975

Iowa Electric Light and Power Company
ATTN: Mr. J. A. Wallace
Vice President-Generation
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Docket No. 50-331

Gentlemen:

Thank you for your letters dated October 27, and November 28, 1975, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in our letter dated October 6, 1975. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

cc: D. Arnold, President
G. G. Hunt
Chief, Engineer

bcc w/ltrs dtd 10/27 and
11/28/75:
PDR
Local PDR
NSIC
TIC

October 27, 1975

position during the inspection, the licensee does not concur that the event had the potential for causing or contributing to an occurrence with safety significance as stated in the NRC Inspector's report. The fact that the valves were "open" did not present a potential for degradation of primary containment integrity. The TIP machine ball valves would have automatically closed in the event of a primary containment isolation.

2. Infraction: "Contrary to paragraph 3.8.C.2 of the Duane Arnold Technical Specifications, the required Emergency Service Water System operability tests were not performed on August 12, 1975 and August 14, 1975."

Response: The Operations Supervisor has reinstructed the appropriate operations personnel with respect to additional surveillance that may be required by the Technical Specifications following a declaration of inoperability of a safety system or component. The requirements for Emergency Service Water System operability testing have been included in the reinstruction.

3. Infraction: "Contrary to 10CFR50, Appendix B, Section XVII, records of evaluation of the affect of incorrect snubber installation were not maintained to furnish evidence of activities affecting quality as required by QAD 1314.1."

Response: The abnormal occurrence involving the discovery of an incorrectly installed seismic snubber on the HPCI steam exhaust line was evaluated by the Licensee's Engineering Department. The evaluation verified the correct installation of the snubber and determined that the previous incorrect installation of the snubber did not have an adverse affect on the HPCI steam exhaust line. However, as noted in the Inspector's report, the evaluation performed by the Engineering Department was not documented due to an oversight. The Licensee's Engineering Department is in the process of preparing documentation on the evaluation that was previously performed.

4. Infraction: "Contrary to Technical Specification 6.6, the Operations Committee reports for the occurrence of reactor high pressure trip and high pressure permissive trip level settings did not include adequate evaluation of the cause nor recommendations for actions to prevent recurrence."

Response: The Licensee does not concur with the NRC Inspector's opinion that the cause of Abnormal Occurrences AO 50-331/75-41 and 75-42 was an inaccurate test gauge or incorrect testing technique. Since previous surveillance testing had not indicated any trending towards an out-of-calibration condition, there was no reason to suspect that the

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

October 27, 1975

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to NRC Office of Inspection
and Enforcement letter, dated October
6, 1975.

File: A-110

Dear Mr. Keppler:

This letter is in response to your letter of October 6, 1975 concerning an inspection of activities at the Duane Arnold Energy Center conducted on August 26-30 and September 4 and 5, 1975. The following responses indicate the actions which have been or will be taken to correct the infractions and deficiencies noted in your letter, when appropriate:

1. Infraction: "Contrary to paragraph 6.8.1 of the Duane Arnold Technical Specifications, approved station operating procedures were not adhered to in that:

- a) A jumper was installed that was not called for in the procedure.
- b) TIP machine ball valve position selector switches were not in accordance with the procedure."

Response: a) The Shift Supervising Engineer involved has been reinstructed as to the administrative control procedure requirements for revisions to plant procedures and jumper and lifted lead control.

b) It is not known why the TIP machine ball valve manual selector switches were in the "open" position. In accordance with operating procedures, the switches should have been in the "closed" position. The switches were returned to the closed position at the time of discovery. Although the manual control switches were found in the "open"

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cause of the occurrence was anything other than instrument drift. Personnel performing the test were using an approved surveillance test procedure which had been previously demonstrated as satisfactory. It should also be noted that the calibration of test gauge P-3 was verified at the NRC Inspector's request and found to be satisfactory.

5. Deficiency: "Contrary to 10CFR, Part 50, Appendix B, Criterion V, the Licensee failed to comply with the station administrative control procedures by failing to maintain operating logs in accordance with ACP 1404.4."

Response: Operating personnel have been reinstructed as to logging requirements identified in the administrative control procedures. In addition, logging requirements have been revised in accordance with appropriate quality assurance directives.

6. Deficiency: "Contrary to 10CFR, Part 50, Appendix B, Criterion V, the Licensee failed to comply with the station administrative control procedures by installing a jumper that was not in accordance with the jumper and lifted lead control procedure (ACP 1404.6)."

Response: The Shift Supervising Engineer involved has been reinstructed as to the requirement for obtaining Operations Supervisor approval prior to installing a temporary jumper.

7. Deficiency: "Contrary to 10CFR, Part 50, Appendix B, Criterion V, the Licensee failed to comply with the station administrative control procedures by failing to perform a special calibration to test gauge P-3 in accordance with ACP 1406.3, after tests performed on July 24, 1975 indicated that the gauge accuracy was suspect."

Response: See response to item 4 above. Since the Licensee concluded that the cause of the subject abnormal occurrences was instrument drift, the calibration of test gauge P-3 was not questioned at the time of the occurrence.

Very truly yours,

J. A. Wallace
J. A. Wallace
Vice President-Generation

JAW:ar

c.c. Mr. D. Arnold
Mr. G. Hunt
Mr. E. Hammond
Mr. L. Liu
Mr. D. Wilson
Mr. L. Root
Mr. H. Rehrauer
Mr. G. Cook
Mr. K. Meyer
Mr. J. Newman

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

November 28, 1975

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: NRC Office of Inspection and Enforcement
Report No. AO 50-331/75-13

File: A-110

Dear Mr. Keppler:

On October 27, 1975, a letter was transmitted to your office in response to the Office of Inspection and Enforcement letter, dated October 6, 1975. The purpose of this letter is to clarify certain responses and revise the format of the letter previously transmitted to your office. The responses contained herein are intended to supersede those in the previous letter.

The following responses indicate the actions that have been or will be taken to correct the infractions and deficiencies noted in the subject report. Each of the responses include (1) corrective steps which have been taken with respect to the infraction or deficiency, (2) corrective steps taken to avoid future items of noncompliance, and (3) the date when full compliance will be achieved.

Infraction: "Contrary to paragraph 6.8.1 of the Duane Arnold Technical Specifications, approved station operating procedures were not adhered to in that a jumper was installed that was not called for in the procedure."

- Response:
- 1) The jumper was removed at the time the infraction was noted.
 - 2) The Shift Supervising Engineer involved will be re-instructed as to the administrative control procedure requirements for revisions to plant procedures and jumper and lifted lead control.
 - 3) Corrective action will be completed by December 15, 1975.

Infraction: "Contrary to paragraph 6.8.1 of the Duane Arnold Technical Specifications, approved station operating procedures were not adhered to in that TIP machine ball valve position selector switches were not in accordance with the procedure.

Response: It is not known why TIP machine ball valve manual selector switches were in the "open" position. In accordance with operating procedures, the switches should have been in the "closed" position. The fact that the valves were "open" did not present a potential for degradation of primary containment integrity. The TIP machine ball valves would have automatically closed in the event of a primary containment isolation.

- 1) The switches were returned to the "closed" position at the time of discovery.
- 2) Operating personnel will be reinstructed as to the requirements for ensuring that the operation of all valves are in accordance with approved operating procedures.
- 3) Corrective action will be completed by December 15, 1975.

Infraction: "Contrary to paragraph 3.8.C.2 of the Duane Arnold Technical Specifications, the required Emergency Service Water System operability tests were not performed on August 12, 1975 and August 14, 1975."

Response: 1) Corrective action was no longer appropriate at the time the infraction was identified by NRC personnel.

2) The Operations Supervisor will reinstruct the appropriate operations personnel with respect to additional surveillance that may be required by the Technical Specifications following a declaration of inoperability of a safety system or component. The requirements for Emergency Service Water System operability testing will be included in the reinstruction.

- 3) Corrective action will be completed by December 15, 1975.

Infraction: "Contrary to 10CFR50, Appendix B, Section XVII, records of evaluation of the affect of incorrect snubber installation were not maintained to furnish evidence of activities affecting quality as required by QAD 1313.1."

Response: The abnormal occurrence involving the discovery of an incorrectly installed seismic snubber on the HPCI steam exhaust line was evaluated by the Licensee's Engineering Department. The evaluation determined the correct installation of the snubber and verified that the previous incorrect installation of the snubber did not have an adverse affect on the

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HPCI steam exhaust line. However, as noted in the Inspector's report, the evaluation performed by the Engineering Department was not documented due to an oversight.

- 1) The Licensee's Engineering Department has now completed documentation of the evaluation.
- 2) The results of future evaluations performed by the Licensee's Engineering Department as the result of abnormal occurrences will be documented.
- 3) Corrective action has been completed.

Infraction: "Contrary to Technical Specification 6.6, the Operations Committee reports for the occurrence of reactor high pressure trip and high pressure permissive trip level settings did not include adequate evaluation of the cause nor recommendations for actions to prevent recurrence."

Response: The Licensee did perform an evaluation of Abnormal Occurrence AO 50-331/75-41 and 75-42 even though the evaluation was not adequately documented. The evaluation determined that the cause of both occurrences was instrument drift. Previous surveillance data had not indicated a recurrent drift problem with the switches. The evaluation also determined that the Licensee's surveillance data trending program was sufficient corrective action to prevent repetition of the occurrence.

- 1) The evaluation form for Abnormal Occurrences AO 50-331/75-41 and 75-42 will be completed and inserted in the abnormal occurrence file.
- 2) The evaluation of any future abnormal occurrences will be documented on a special form. The form will require the evaluator of the occurrence to state an opinion as to the cause of the occurrence. If the occurrence involves an out-of-specification instrument setpoint, the form will require the evaluator to determine whether proper test procedures and/or techniques were used and whether the test instruments were within calibration specifications. The special form will also require that the evaluator determine the adequacy of corrective action and whether additional surveillance is required on a temporary or permanent basis.
- 3) Corrective action will be completed by December 15, 1975.

Deficiency: "Contrary to 10CFR, Part 50, Appendix B, Criterion V, the Licensee failed to comply with the station administrative control procedures by failing to maintain operating logs in accordance with ACP 1404.4."

Response: 1) Corrective action was no longer appropriate at the time the deficiency was identified by NRC personnel.

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2) Operating personnel have been reinstructed as to logging requirements identified in the administrative control procedures. In addition, logging requirements have been revised in accordance with appropriate quality assurance directives.

3) Corrective action has been completed.

Deficiency: "Contrary to 10CFR, Part 50, Appendix B, Criterion V, the Licensee failed to comply with the station administrative control procedures by installing a jumper that was not in accordance with the jumper and lifted lead control procedure (ACP 1404.6)."

Response: 1) Corrective action was no longer appropriate at the time the deficiency was identified by NRC personnel.

2) All Shift Supervising Engineers will be reinstructed as to the requirement for obtaining Operations Supervisor approval prior to installing a temporary jumper.

3) Corrective action will be completed by December 15, 1975.

Deficiency: "Contrary to 10CFR, Part 50, Appendix B, Criterion V, the Licensee failed to comply with the station administrative control procedures by failing to perform a special calibration to test gauge P-3 in accordance with ACP 1406.3, after tests performed on July 24, 1975 indicated that the gauge accuracy was suspect."

Response: A special calibration of test gauge P-3 was performed on July 24, 1975, however, the special calibration was not documented.

1) Corrective action was no longer appropriate at the time the deficiency was identified by NRC personnel

2) Maintenance supervisory personnel have been reinstructed as to requirements for completing the proper documentation whenever a test instrument is calibrated or checked for accuracy.

3) Corrective action has been completed.

Very truly yours,

J. A. Wallace
Vice President-Generation

JAW:ar

c.c. Mr. D. Arnold
Mr. G. Hunt
Mr. E. Hammond
Mr. L. Liu
Mr. D. Wilson
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