

Iowa Electric Light and Power Company

July 29, 1981
LDR-81-241

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

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

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 81-13

File: A-102, NRC-4, Inspection Report 81-13

Dear Mr. Keppler:

This letter is in response to Mr. C. E. Norelius' letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on June 1-5, 1981. The following responses indicate the actions which have been taken and which will be taken to correct the two items of noncompliance noted in the subject Inspection Report.

Item of Noncompliance 1

Duane Arnold Energy Center Technical Specifications Section 6:8.1 states in part, "Detailed written procedures involving nuclear safety ... shall be prepared ... All procedures shall be adhered to."

Duane Arnold Energy Center Administrative Control Procedure 1406.4, Revision 8, dated September 26, 1980, in Paragraph 5.3 states in part that when an instrument is out-of-calibration or the calibration sticker is expired, the test equipment shall be removed from use and segregated. Paragraph 5.8 states in part that when calibration, testing or other measuring devices are found to be out-of-calibration, an evaluation shall be made and documented ... concerning the validity of previous tests and the acceptability of devices previously tested.

- a. Contrary to the above, Wallace & Tiernan gauge M-103 was found to be out-of tolerance during a normal recalibration on July 23, 1980, and no evidence could be found of any evaluation of previous usage for validity. The inspector made a random search of approximately 30 other M&TE calibration data sheets and found similar problems with five additional items: E-128; M-83; P-3; P-167; and P-184.

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- b. Contrary to the above, the inspector found a high pressure test pump and gauge, P-3, next to a RPS Div I instrument rack. The gauge calibration had expired April 14, 1981, seven weeks prior to its discovery by the inspector. The gauge had not been removed from service and identified as nonconforming.

Response

1. Corrective action taken and the results achieved:

The specific measuring and test equipment (M&TE) found to be out-of-tolerance identified in Item a. by the NRC inspector has subsequently been recalibrated into tolerance. Also M&TE calibration data sheets for this equipment and surveillance testing records have been reviewed for validity and previous tests performed using this equipment were found to be acceptable. The calibration of the high pressure test pump and gauge, P-3, identified by the NRC inspector as not having been removed from service after the gauge calibration had expired, was checked on June 18, 1981 and found to be in tolerance.

The appropriate DAEC plant personnel have been made aware that these problems occurred in conflict with the DAEC Administrative Control Procedures (ACPs). DAEC ACPs require that M&TE calibration records contain an "evaluation, for instruments found out of tolerance, concerning the validity of previous measurements and tests and the acceptability of items previously measured and tested." This evaluation is the responsibility of the DAEC Electrical Maintenance Supervisor. In order to prevent recurrence of this ACP violation, the appropriate DAEC plant personnel have been advised of this problem and retrained to re-emphasize the importance of strict adherence to the ACP on the Control of Measuring and Test Equipment.

2. Corrective action to be taken to avoid further noncompliance:

In order to ensure that M&TE with an expired calibration is properly removed from service and identified as nonconforming, the appropriate DAEC ACP concerning the Control of Measuring and Test Equipment will be revised to better address labelling of out-of calibration M&TE.

3. Date when full compliance will be achieved:

DAEC is presently in full compliance regarding the specific deficiencies noted. The DAEC Administrative Control Procedure revision discussed above will be completed by September 1, 1981. The DAEC instrument technicians will be retrained on the revised ACP by October 1, 1981.

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Item of Noncompliance 2

10 CFR 50 Appendix B, Criterion XIV, states in part, "Measures shall be established to indicate, by the use of markings ... the status of inspections and tests performed upon individual items of the nuclear power plant" The licensee's Quality Directive 1312.1 Revision 2, dated April 17, 1980 requires in part that installed instrumentation be suitably marked to indicate calibration status.

Contrary to the above, the inspector noted during the plant walkdown the total lack of calibration status stickers on installed instrumentation. A detailed review of applicable administrative procedures showed that there were no instructions to affix calibration status stickers upon completion of calibration.

Response

1. Corrective action taken and results achieved:

A calibration status tagging program is presently being established for the DAEC installed instrumentation. In order to phase the new tagging program into the normal DAEC activities in an orderly controlled manner, tags will be added to installed instrumentation as these instruments are calibrated in accordance with the existing DAEC Surveillance Testing Procedure (STP) program and "Mini-MAR" instrument calibration program. The calibration status tags will indicate the date of calibration and identity of the person that performed the calibration in accordance with ANSI N45.2.4-1972.

2. Corrective action to be taken to avoid further noncompliance:

The appropriate ACP will be revised to describe the control and implementation of the calibration status tagging program for the DAEC installed instrumentation in accordance with the requirements of QAD 1312.1.

3. Date when full compliance will be achieved:

Full compliance regarding the instrumentation calibration status tagging program for safety related instrumentation is anticipated at the completion of the 1982 refueling outage. This tagging program is presently being established and is expected to be incorporated into the existing STP and "Mini-MAR" program by November 1, 1981.

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This response is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By Larry D. Root
Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/DWT/p1

Subscribed and sworn to before me on this 21st day of July, 1981.

Kathleen M. Herbert
Notary Public in and for the State of Iowa

cc: Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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