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 FRANZ, J. F. Iowa Electric Light & Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T. E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Provides response to notice of violations noted in Insp Rept 50-331/92-15. Corrective actions: during insp, active extended temporary mods audited revealing addl drawings that had not been updated.

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Iowa Electric Light and Power Company

August 28, 1992
NG-92-3905

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
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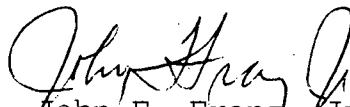
Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to a Notice of Violation
Transmitted with Inspection Report 92015
File: A-105, A-102

Dear Dr. Murley:

This letter and attachment are provided in response to the Notice of Violation concerning activities at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact my office.

Very truly yours,


John F. Franz, Jr.
Vice President, Nuclear

JFF/CJR/pjv~

Attachment: Reply to a Notice of Violation Transmitted with
Inspection Report 92015

cc: C. Rushworth
L. Liu
L. Root
R. McGaughy
C. Shiraki (NRC-NRR)
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Q PDR

IOWA ELECTRIC LIGHT AND POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
TRANSMITTED WITH INSPECTION REPORT 92015

VIOLATION

Criterion V of 10 CFR Section 50, Appendix B, requires, in part, that activities affecting quality shall be prescribed by procedures and shall be accomplished in accordance with these procedures.

Contrary to the above:

- a. On June 21 and June 26, 1991, for Temporary Modifications 90-664 and 90-665, respectively, activities were not accomplished in accordance with procedures when these temporary modifications were made extended temporary modifications, and no Temporary Modification As-Built Notification Letters were transmitted to the Advanced Information Drawing System Coordinator as required by Duane Arnold Energy Center Procedure 1410.6, Revision 0, Section 6.7 dated June 8, 1990.
- b. On May 15, 1991, an activity was not accomplished in accordance with Procedure 1410.6, Revision 0, Section 6.7 dated June 8, 1990, when Temporary Modification 91-314 was implemented and the applicable piping and instrument control room drawing was not updated as needed to reflect the as-built information.

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

RESPONSE TO VIOLATION

1. Reason for the Violation

Procedure 1410.6, "Temporary Modification Control," Revision 0, effective June 8, 1990, required the control room drawings to be "updated" for extended Temporary Modifications (TMs). This "updating" was to be accomplished by marking up the affected Control Room Rack Position Drawings as needed to reflect as-built information. The updated drawings would then be stamped "AFFECTED BY COMPLETED EXTENDED TEMPORARY MODIFICATION" and marked with the Temporary Modification Number. In addition, a "Temporary Modification As-Built Notification Letter" along with a copy of any changes made to the drawings would be transmitted to the Advanced Information Drawing System (AIDS) coordinator to ensure the updating of drawings

outside of the control room. The two examples of failure to follow this procedure, as identified in the Violation are as follows:

- 1) On November 8, 1990, TMs 90-664 and 90-665 lifted the leads to two differential pressure switches used to detect backflow from the standby gas treatment system into the turbine building and to close ventilation dampers accordingly. These TMs were changed to extended TMs in June, 1991. While the control room drawings were updated, no "Temporary Modification As-Built Notification Letters" were transmitted to the AIDS coordinator when these TMs were upgraded. Consequently, the affected drawings outside of the control room were not updated to show that the two differential pressure switches had been disconnected.
- 2) Extended TM 91-314 installed orifices in the control air lines for two control valves on May 15, 1991. The orifices were installed to improve control valve reliability. However, because the orifice was considered to be below the level of detail necessary for the control room operators, the applicable piping and instrument drawing was not updated.

A Human Performance Enhancement System (HPES) evaluation was performed on the temporary modification process. This evaluation included a thorough review of the procedure which governs temporary modifications and interviews with personnel who use it. These interviews indicated that the procedure is confusing and difficult to use because of its scope, length and organization.

2. The Corrective Steps That Have Been Taken and the Results Achieved

During the inspection, all active extended TMs were audited revealing additional drawings that had not been updated. The drawings identified in this audit and in the Notice of Violation were updated as of July 14, 1992.

3. The Corrective Steps That Will be Taken to Avoid Further Violations

As a result of the HPES evaluation, a decision was made to rewrite the temporary modification procedure. This revision will narrow the scope, reorganize and clarify

the procedure; it will be much more "user friendly". The procedure will require updated drawings for all temporary modifications, not just extended TMs.

Prior to implementation, formal classroom training will be provided to all personnel who use this procedure including operators, maintenance personnel and engineers. This training will ensure that all personnel involved with TMs understand and follow the procedure. The procedure revision and the above described training will be completed by December 31, 1992.

To ensure that drawings are properly updated in the interim, systems engineers were trained on the requirements to update drawings for extended temporary modifications at an August 14, 1992 meeting. In addition, the Temporary Modification Coordinator for Systems Engineering will perform bi-weekly audits to ensure that drawings are being properly updated for extended TMs. These audits will continue until the new procedure has been implemented.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved with the updating of the drawings on July 14, 1992.