

Iowa Electric Light and Power Company

December 16, 1983

NG-83-4278

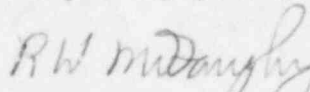
Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center
Docket No. 50-331
Op. License No. DPR-49
Response to NRC Inspection Report 83-16

Dear Mr. Keppler:

This letter is provided in response to Mr. W. D. Shafer's letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on October 1 through October 31, 1983. Attachment 1 provides the subject response in accordance with your request.

Very truly yours,



Richard W. McGaughy
Manager, Nuclear Division

RWM/MWA/pf*

Attachment

cc: M. Andersen
L. Liu
S. Tuthill
M. Thadani
NRC Resident Inspector
Commitment Control #830296
File A-102, NRC-4

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Attachment 1

NRC Item of Non-Compliance

Technical Specification Section 4.1.A.1 states in part "Instrumentation shall be ... calibrated as indicated in Tables 4.1-1 and 4.1-2 respectively."

Contrary to the above, Main Steam Line High Radiation Monitors were not calibrated within the allowable 3 month time span as required by Table 4.1-2.

Response to Item of Non-Compliance

1. Corrective action taken and the results achieved:

On 10/17/83, an internal review of calibration of Main Steam Line High Radiation Instruments revealed that the quarterly calibration scheduled for 7/25/83 was not performed. Upon discovery of the missed calibration, the Electrical Maintenance Department immediately performed the quarterly calibration. All channels were found to be in calibration. In accordance with Technical Specification Appendix A, Section 6.11.2.b(3) Licensee Event Report 83-039 was submitted.

The Plant Superintendent - Nuclear directed a review of this event and the surveillance program as a whole by the Assistant Plant Superintendent - Technical Support and the Plant Performance Department. This review concluded that this noncompliance was caused by an administrative error as a result of inadequate attention to detail concerning surveillance test procedure (STP) sign-offs. The STP consists of two portions: 1) weekly functional test and 2) quarterly calibration. The functional test is performed by operations personnel; the quarterly calibration is performed by the Electrical Maintenance Department. The weekly functional test was performed as scheduled on 7/25/83 however, operations personnel mistakenly signed off the quarterly calibration portion as not applicable. In addition, the STP went through the regular review cycle and was filed but, the error was not noticed. The error was identified on 10/17/83 by the DAEC Surveillance Coordinator.

Increased emphasis by appropriate administrative personnel and department supervisors has been directed to ensure increased attention to details for adequate review before performing and completion review of the STPs. The Plant Performance Department Supervisor is performing periodic reviews of STPs for adequate completion. Any problems in sign-offs and inadequate closure of STPs will be given direct attention by the appropriate Assistant Plant Superintendent. In the past, STP reviews and entry into the STP tracking system were not accomplished when the plant was off-line. Now, a technical group reviews STPs and inputs them into the tracking system at all times, regardless of plant operation. In addition, a Quality Assurance Audit was performed of the surveillance test program and procedures. Further program enhancements as recommended by this audit are being implemented.

Attachment 1

Response to Item of Non-Compliance (cont.)

2. Corrective action to be taken to avoid further non-compliance:

The STP is currently being revised to segregate the functional test portion from the quarterly calibration portion to avoid recurrence. The revised STP is expected to be issued by 1/31/84. In addition, computer software enhancements to the STP tracking system are being developed allowing for improved control by the Surveillance Coordinator. This allows for easier review access by all plant personnel associated with the STP program. These changes will be completed by 1/1/84.

3. Date when full compliance will be achieved:

Full compliance was achieved on 10/17/83 when the quarterly calibration of Main Steam Line High Radiation Monitors was performed with satisfactory results.