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John F. Franz, Jr.  
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November 20, 1995  
NG-95-3263

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-37  
Washington, D.C. 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 95008  
File: A-105, A-102

Dear Sir:

This letter and attachment are provided in response to the Notice of Violation transmitted with NRC Inspection Report 95008.

The following new commitment is made in this letter. The DAEC Quality Assurance Department has committed to performing a follow-up assessment to evaluate the effectiveness of the Tagout Program improvements and the training provided to the Operations Department. This assessment will be completed by April 30, 1996.

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

Sincerely,

John F. Franz  
Vice President, Nuclear

Attachment: Reply to a Notice of Violation Transmitted with Inspection Report 95008.

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An IES Industries Company

**IES Utilities Inc.**  
**Reply to a Notice of Violation**  
**Transmitted with Inspection Report 95008**

**VIOLATION**

Criterion V of 10 CFR Part 50, Appendix B, requires that activities affecting quality be accomplished in accordance with procedures. Administrative Control Procedure 1410.5, "Tagout Procedure," Revision 17, required that correct valve position be determined prior to restoring systems.

Contrary to the above, during restoration on September 6, 1995, of a tagout on the containment atmosphere dilution system, an activity affecting quality, the correct valve position was not determined for two valves prior to restoration of the system and as a result, the two valves were found to be out of position on September 12, 1995. (50-331/95008-01 (DRP))

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

**RESPONSE TO VIOLATION**

**1. REASON FOR THE VIOLATION**

On September 12, 1995, during preparation for the performance of Surveillance Test Procedure (STP) 47H001, "Functional Check and Calibration of Containment Atmosphere Dilution System," Instrument and Control (I&C) technicians discovered two valves in the "Open" position. These valves isolate a pressure indicator. The pressure indicator (PI-4323A) is only used during testing of the Containment Atmosphere Dilution (CAD) System. According to the STP, the "as-found" position of the valves should have been "Closed". The I&C technicians reported this discrepancy to the Operations Shift Supervisor in the Control Room and documented it on an "Action Request" (AR) form. The Operations Shift Supervisor confirmed that "Containment Atmosphere Control System" Operating Instruction (OI-573) required the valves in question to be in the "Closed" position during normal operations.

The DAEC Operations Department reviewed the event and determined that on September 6, 1995 the valves were left in the "Open" position following corrective maintenance to replace the packing on one of the valves. As a part of the post maintenance "operability testing" required by the Corrective Maintenance Action Request (CMAR), the Operations Department was to verify the correct valve lineup. Administrative Control Procedure (ACP) 1410.5 "Tagout Procedure" requires the operator to "Reference the applicable Operating Instruction, as necessary, to determine correct switch/valve/equipment position

for the system status." Neither of the operators involved in the tag clearance/valve restoration referred to OI-573 to determine proper valve position.

The failure to refer to the applicable Operating Instruction and compare valve position with that required for normal plant operation resulted in the two valves being left in the "Open" position.

2. **CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED**

The isolation valves for PI-4323A were tagged "Open" for the performance of STP 47H001. When that test was completed, the valves were placed in the "Closed" position as a part of the post-test valve lineup as required by the STP. Both of the operators involved in the tag clearance/valve restoration incident of September 6, 1995 and the Operations Shift Supervisor were entered into the DAEC Employee Accountability Program.

The DAEC Tagout Program must provide protection for personnel, plant equipment, and systems during operational and maintenance activities. In addition, the Tagout Program must include adequate controls which assure that systems are returned to the required operational positions upon completion of work.

As a result of previous events involving the DAEC tagout process (as noted in previous Inspection Reports) DAEC management initiated a review of the Tagout Program. The review included the need to identify desired valve positions when clearing and verifying tagouts. This review was started in February, 1995 and concluded with the issuance of a complete revision of the Tagout Procedure (ACP 1410.5) on October 30, 1995 and training on the Tagout Program as a part of cycle 4 (August - October, 1995) Operator Requalification Training. The revised tagout procedure provides additional guidance on tagging activities including tag sequence, partial installation of tagouts, and restoration of valve position.

Management expectations regarding implementation of the Tagout Program were communicated to the operating crews and were reinforced through periodic observations, by Operations supervision and the Quality Assurance Department, of tagging activities.

The cycle 4 Operator Requalification Training discussions focused on the importance of assuring that components are maintained in the required position during maintenance activities, the importance of error-free performance during tagging activities, and previous tagging issues identified by DAEC personnel. Note: The individuals involved in the September 6th incident cited in this Notice of Violation had not yet attended one of the training sessions. Following discovery of the valve positioning error on September 12th, the individuals involved were included in the next scheduled session.

Additionally, an Operations Department Instruction, ODI-019 "Tagging Practices", has been implemented that clearly communicates management expectations concerning standard tagging practices such as prejob briefings, the use of tagging forms (which contain the required valve positions) in the plant, and expectations for oversight of tagging activities by the Operations Shift Supervisor. This document provides a consistent basis for initial and continuing training for operators.

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

The DAEC Quality Assurance Department has committed to performing a follow-up assessment to evaluate the effectiveness of the Tagout Program improvements and the training provided to the Operations Department. This assessment will be completed by April 30, 1996.

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

The Duane Arnold Energy Center was in full compliance on September 12, 1995 when the valves were returned to their correct ("Closed") positions following the completion of STP 47H001.