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John F. Franz, Jr.
Vice President, Nuclear

December 17, 1996
NG-96-2656

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 96009
File: A-105, A-102

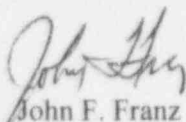
Dear Sir:

This letter and attachment are provided in response to the Notice of Violation transmitted with NRC Inspection Report 96009. In response to this event, we have consulted with a vendor who has assessed applicable aspects of our hose control process. As a result, we will be providing improved tools and training to our staff in the 1st quarter of 1997.

This letter contains no new commitments.

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 96009

cc: L. Sueper
L. Root
G. Kelly (NRC-NRR)
A. Bill Beach (Region III)
NRC Resident Office
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An IES Industries Company

**IES Utilities Inc.
Reply to a Notice of Violation
Transmitted with Inspection Report 96009**

VIOLATION

10 CFR 50, Appendix B, Criterion V, requires in part, that activities affecting quality be prescribed by documented procedures of a type appropriate for the circumstances, and be accomplished in accordance with these procedures.

Contrary to the above, Administrative Control Procedure Number 1411.7 Revision 3, dated February 6, 1995 "Hose Control Procedures" which prescribes that leak testing of hoses shall be accomplished by mechanical maintenance, an activity affecting quality, was not accomplished.

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

RESPONSE TO VIOLATION

1. REASON FOR THE VIOLATION

In 1993, Administrative Control Procedure (ACP) 1411.7, Revision 2, "Hose Control Procedures," added a requirement for Mechanical Maintenance to perform periodic leak testing of breathing and service air hoses in a proactive attempt to identify hoses that were approaching the end of their useful life. This revision went into effect before specific testing methods and acceptance criteria had been developed and without establishing a scheduling mechanism to ensure the periodic testing took place, such as a Preventative Maintenance Action Request (PMAR), contrary to the requirements of ACP 106.2, "Procedure Preparation, Review, and Approval." ACP 106.2 is intended, in part, to ensure that supporting programs and procedures are established and departmental responsibilities are effectively communicated prior to implementing new or revised procedures.

On October 14, 1996, during the refueling outage, two crews of boilermakers were using pneumatic impact wrenches in the reactor cavity to loosen the drywell head studs. One crew finished their work and placed a wrench on the pool plug ledge. Within minutes, the shank of a Chicago fitting slipped free of the hose despite being secured by a hose clamp and became disconnected. The hose, which was supplied with service air pressure, landed in the bellows area and caused an airborne contamination condition. The air supply to the hose was immediately secured by personnel outside of the reactor cavity and the area was evacuated.

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

Because the air hose had been pressurized and in use for several hours without exhibiting any outward signs of degradation prior to the failure, the DAEC has reconsidered the potential effectiveness of performing leak testing. This requirement has been removed from ACP 1411.7, "Hose Control Procedures." The Helper department now has overall responsibility for implementation of the revised procedure. In addition, the requirements of ACP 106.2, "Procedure Preparation, Review, and Approval," have been reiterated to appropriate personnel.

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

ACP 1411.7, "Hose Control Procedures," has been revised to preclude a recurrence of noncompliance with this requirement. In addition, implementation of the revised procedure is assured by assignment of a clear owner of the procedure tasks and implementation procedures.

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

Full compliance was achieved on December 13, 1996, with the issuance of the revision to ACP 1411.7, "Hose Control Procedures", which removed the requirement to perform leak testing of hoses each operating cycle.