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NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

APR 29 1975

Iowa Electric Light and Power Company
ATTN: Mr. Charles W. Sandford
Executive Vice President
Engineering

Docket No. 50-331

Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Gentlemen:

Thank you for your letter dated April 22, 1975, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in our letter dated March 27, 1975. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations Branch

bcc w/ltr dtd 4/22/75:
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IE:HQ (4)
Licensing (4)
Central Files
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NSIC
TIC
OCG, Beth P-506A



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IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

CHARLES W. SANDFORD
EXECUTIVE VICE PRESIDENT

April 22, 1975

Mr. Gaston Fiorelli, Chief
Reactor Operations Branch
Office of Inspection and Enforcement, Region III
Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: USNRC Office of Inspection and Enforcement
letter dated March 27, 1975, Mr. G. Fiorelli
to C. W. Sandford

Dear Sir:

This letter is in response to the reference letter concerning the inspection conducted by USNRC Office of Inspection and Enforcement personnel at the Duane Arnold Energy Center on February 11 - 13, 20 and 21, 1975.

Following is a summary of those corrective actions that have been initiated with respect to the enforcement action items listed in the referenced letter:

Enforcement

Action Item No. Corrective Action

B.1.a

The general water quality analyses specified in Specification 4.1.1.1 were not conducted at the discharge canal sample location because there was no water in the canal on the scheduled collection day. Consultant laboratory personnel utilized to collect and analyze the samples have been instructed to ascertain that there is water in the canal before coming to the plant to collect samples. They have also been reinstructed to collect samples as specified in the Technical Specifications. DAEC is presently in full compliance with the semi-monthly general water quality analyses as specified in Specification 4.1.1.1.

April 22, 1975

- B.1.b Consultant laboratory personnel have been instructed to conduct the benthic studies as specified in the plant Technical Specifications. DAEC personnel will increase surveillance of consultant activities to ensure compliance with Technical Specification requirements. DAEC is presently in full compliance with the benthic study requirements of Specification 4.1.1.5.
- B.1.c Consultant laboratory personnel have been instructed to conduct the impingement studies as specified in the plant Technical Specifications. DAEC personnel will increase surveillance of consultant activities to ensure compliance with Technical Specification requirements. DAEC is presently in full compliance with the impingement study requirements of Specification 4.1.1.9.
- B.1.d Consultant laboratory personnel have been instructed to conduct the salt drift damage studies as specified in the plant Technical Specifications. Additionally, Specification 4.1.2 is in the process of being revised to correctly state when salt drift inspections should be conducted. DAEC personnel will increase surveillance of consultant activities to ensure compliance with Technical Specifications requirements. DAEC is presently in full compliance with the visual inspection for salt drift damage requirement of Specification 4.1.2.
- C.1.a Procedures for calibration of the thermoluminescent dosimeter monitoring equipment have been prepared and approved. Also, a thorough review has been conducted to make certain procedures applicable to the calibration of environmental monitoring equipment have been prepared, approved and followed. DAEC is presently in full compliance with the requirements of the Technical Specifications concerning approved procedures for the calibration of thermoluminescent dosimeter monitoring equipment.
- C.1.b The environmental radiological sample collection procedures have been reviewed and approved by the Operations Committee.
- A thorough review has been made of all radiological sample collections and procedures have been prepared and approved where applicable.

April 22, 1975

DAEC is presently in full compliance with the Technical Specification requirement to have Operations Committee approved procedures for the collection of environmental radiological samples.

Response to items C.2.a and C.2.b: The apparent cause of these items of noncompliance is as follows:

The DAEC Surveillance Program, which is the method for assuring that Technical Specifications requirements are met, apply only to Appendix A. The Appendix B surveillance requirements are the responsibility of the Radiation Protection and Chemistry Group. Having a separate method of assuring compliance to portions of Appendix B led to instances where one group (Operations) was responsible for the surveillance of part of the requirements while a separate group (Radiation Protection and Chemistry) was responsible for compliance and reporting. Absence of a mechanism to assure compliance to several requirements of Appendix B within Operations led to the subject deficiency.

The corrective action is to include, in the DAEC Surveillance Program, all items of Appendix B not specifically monitored by the Radiation and Protection Group. In this manner the Operations Group will be responsible for the surveillance, compliance and reporting activities relating to these several Appendix B requirements.

If you have any further questions concerning this matter, please do not hesitate to contact this office.

Very truly yours,

Charles W. Sandford
Charles W. Sandford
Executive Vice President

CWS:D

cc: J. Wallace
G. Hunt
E. Hammond
R. Graybeal
D. Wilson
J. Newman
J. Ward
H. Rehrauer
G. Cook