

UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

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TELEPHONE
(312) 858-2650

A. RO Inspection Report No. 050-331/74-07

Transmittal Date : March 27, 1974

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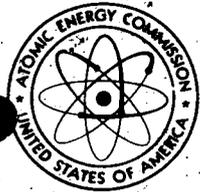
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TELEPHONE
(312) 858-2660

MAR 27 1974

Iowa Electric Light and Power Company
ATTN: Mr. Charles W. Sandford
Vice President, Engineering
P. O. Box 351
Cedar Rapids, Iowa 52405

Docket No. 50-331

Gentlemen:

This refers to the inspection conducted by Mr. James F. Donahue of this office on January 29-30, 1974 of activities at the Duane Arnold Energy Center, authorized by AEC Construction Permit No. CPPR-70 and to the discussion of our findings with Messrs. Hunt, Hammond, Ward and Vanous of your staff at the conclusion of the inspection.

Areas examined during this inspection included review and evaluation of the DAEC Security plan and its implementing procedures, inspection of physical barriers, access controls, personnel identification and control, protective personnel, intrusion alarms, communications, lighting, personnel screening and training, visitor control and emergency procedures relating to security. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with plant personnel and observations by the inspector.

No items of noncompliance were identified within the scope of this inspection. The areas examined during the inspection concern a subject matter which is exempt from disclosure according to Section 2.790 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Consequently, our report of this inspection and the attachment to this letter will not be placed in the Public Document Room.

The attachment identifies certain matters involving program weaknesses which were discussed with corporate office and site representatives. We would appreciate receiving your comments on these matters within thirty days. We will examine your actions on these matters during a subsequent inspection.

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MAR 27 1974

Iowa Electric Light
and Power Company

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Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

James G. Keppler
Regional Director

Attachment:
Program Weaknesses
(Exempt from Disclosure)

bcc: RO Chief, FS&EB, w/encl
RO:HQ (4)
Licensing (4)
DR Central Files, w/encl
RO Files, w/encl
PDR
Local PDR
NSIC
DTIE
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Iowa Electric Light and Power Company
Docket No. 50-331

Following are program weaknesses discussed with IELP and DAEC representatives and the understandings reached:

1. The DAEC Security Plan, Section 2.1.1.2, paragraph 3, states that the isolation zone (10 feet inside and 25 feet outside the fence) is maintained clear of all objects that could be used to conceal a person. At the west and north sections of the security fence there are trailers, a warehouse and scrap material situated within this isolation zone.

It was agreed that as construction is completed and the need for these temporary structures diminishes, the trailers will be removed, temporary buildings dismantled and scrap and rubble removed from the fence line to provide a clear field of vision of this area.

2. In connection with Finding No. 3 in the attachment to our letter of August 31, 1973, it was our understanding that key cores of vital areas would be changed.

It was established that no keys have been lost to date or were otherwise out of the key control system. It is understood, however, that the key cores of vital areas will be changed prior to or immediately upon completion of construction.

3. With respect to plant protection personnel, discussion was held covering Regulatory Guide 1.17, Section C.1. which states; "The plant security forces should have onsite, armed and uniformed individuals whose primary duties are protection of facilities from acts that could endanger the health and safety of the public."

It was understood during discussions that IELP is reluctant to arm DAEC protective personnel. The providing of an armed force would improve the security program at DAEC since a deterrent to forced entry would be readily available. Also, an armed force would be better equipped to delay intruders pending arrival of local law enforcement agencies. It is our position, consonant with Regulatory Guide 1.17, that an onsite, uniformed and armed security force would enhance the security program at DAEC.

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4. With further reference to Regulatory Guide 1.17, Section C.1.b. states that alarms should annunciate in two continuously manned stations. There are two alarm stations at DAEC, the Control Room and Security Control Point. While the Control Room will invariably be continuously manned, the same may not be realized within the Security Control Point unless there are at least two protective personnel assigned to each shift.

In DAEC Security Procedure SP-5, "Security Alert", several references are made relating to utilization of security guards for several duties (refer to 6.1.1.2, through 6.1.1.6; 6.1.1.8 (1), (2) and (4); 6.1.2.2. (1); 6.1.2.5; 6.2 (4).) It is understood that plans are to have at least two protective personnel on the day shift during the work week but only one per shift at other times. If a security guard is required to conduct patrols, respond in emergency conditions or perform tests on back shifts, a question is raised as to the ability to provide continuous manning of the Security Control (secondary alarm station.) It appears that the proposed size of the plant protection force may not be adequate to fulfill the duties and responsibilities outlined in Security Procedure SP-5, SP-9, 6.2, and SP-10, 5.1 and 5.3.

5. Emergency power is available to provide necessary power to intrusion alarms and the off-site two way radios. Such power is not available for protective lighting should the primary source of power fail. It was agreed that if protective lighting is lost, exterior protective patrols would be conducted more frequently or portable generators provided for spot lighting pending resoration of site protective lighting.

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DIRECTORATE OF REGULATORY OPERATIONS

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REGION III

RO Inspection No. 050-331/74-07

Licensee: Iowa Electric Light and Power Company
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Duane Arnold Energy Center
Palo, Iowa

License No. CPPR-70
Category: B

Type of Licensee: BWR, 538 Mwe

Type of Inspection: Special, Announced Follow-up Industrial Security
Inspection

Dates of Inspection: January 28-30, 1974

Dates of Previous Inspection: August 7-9, 1973 (Industrial Security)

Principal Inspector: *J. F. Donahue*
J. F. Donahue
Investigation Specialist

3/25/74
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *J. A. Hind*
J. A. Hind, Chief
Materials and Plant
Protection Branch

3/22/74
(Date)

Attachment:
Findings (Exempt from Disclosure)

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SUMMARY OF FINDINGS

A follow-up industrial security inspection was conducted on January 29-30, 1974 to ascertain action taken to implement the ten "findings" resulting from the initial security inspection conducted on August 7-9, 1973 (See RO:III Inspection Report No. 050-331/73-10).

Construction is about 97.6% complete with the apparent need of approximately 700 contractor personnel to effect completion of construction. Projected Core load date was given as February 10, 1974 - projected construction completion estimated to be April 1, 1974.

Review and evaluation of the Duane Arnold Security Plan, the program in effect and security plan implementing procedures developed that not all facets of the security program were in effect at the time of this inspection. Complete implementation will be realized on or before April 1, 1974, when all construction has been completed and the construction personnel vacated from the site. Five program weaknesses were identified and were discussed during management closeout and confirmed by RO:III letter to the licensee.

FINDINGS

Status of the actions taken on the ten findings resulting from the initial physical security inspection follow. The initial findings are presented below in abbreviated form and are underscored:

1. Complete security fence, backfill and post with "No Trespassing" Signs.

The security fence has been completed, backfilled and posted with signs at 100' intervals. Sewer lines and drainage culverts have been fitted with steel rebar which are wired to prevent spreading.

On the west and northwest perimeter of the protected area there are temporary trailers, a warehouse and scrap storage area. A clear zone of 25' on either side of the fence, as specified in the Security plan and Security Procedure SP-10, is not provided at present. It was agreed with management that these temporary structures used to house construction personnel and equipment would be moved or dismantled and the scrap removed as soon as practicable. (This is identified as a Program Weakness in the Report Details section of this report).

2. Establish Security Control Point (SCP) - Equip with communications equipment and alarm annunciator panel.

The SCP is essentially complete but is was not yet manned by protective

personnel. (Scheduled date of manning - February 4, 1974). Within the SCP are a telephone, on-site radiotelephone, public address pager and a 100 Watt transceiver. Also an alarm annunciator has been installed but not yet tested (See item #6). A closed circuit TV camera is positioned near the ceiling to view the entire SCP and the two portals and counter windows. The monitor screen for the CCTV is in the Control Room to observe activities with the SCP.

3. Formalize key control procedures - change key cores - Weld or pin the hinge pins of exterior door hinges.

Security Procedures 7 and 8 describe Key Inventory and Key Control, respectively. Also, a written instruction has been prepared for the SCP on the subject of Key Control. The key cores have not been changed on certain interior portals because no keys have been lost or are out of the control system. Assurances were provided that key cores will be changed as soon as construction workers vacate the site. (This is identified as a program weakness in the Report Details of this Report) With respect to exterior hinge pins, a set screw mounted on the inside of the hinge (not accessible when the portal is closed) prevents removal of the hinge pin.

4. Establish Photo identification system-institute badge procedures.

On the date of this inspection, it was observed that photos were being taken of site employees, as well as contractor employees, and that plastic laminated color coded badges were being fabricated. Issuance of badges will commence on February 4, 1974, and from that date on, badges will be required to be worn on the premises at all times. Security Procedures SP-3, "Plant Admittance Procedures", and SP-4, "Control of Personnel and Visitor Access to Plant Security Areas" address the badge system. Procedures require challenge of any person observed not wearing a badge.

5. Select, hire and train a Plant Protection Force - Prepare written instructions - obtain written certification of guard contractor regarding qualifications, character and stability of force members.

DAEC has decided to have a company-employed, rather than a contractor-provided, plant protection force. Four applicants have been screened and will be hired as of February 4, 1974. Two additional applicants were pending completion of their physical examination and, if physically acceptable, will be hired as of February 11, 1974. Since this six member force was yet to be trained, DAEC decided to utilize hand-picked Pinkerton personnel to man to SCP effective February 4, 1974, and to man this post until

the DAEC personnel take over this function. Also, Pinkerton personnel will be assigned to man access control points in the plant internals until all construction personnel have vacated the site.

Security procedures as applicable to the security force will be made available to SCP personnel. Also, it was agreed that formalized general and post orders for the DAEC security force will be prepared.

With respect to pre-employment screening of the Protective Personnel, all have been made the subject of written inquiry to former employers and references and police checks were made. The applicants thus far selected were also carefully interviewed and their behavior observed. As DAEC employees, protective personnel will receive periodic performance evaluations and will receive periodic refresher training courses on their security responsibilities.

In reviewing the content of Regulatory Guide 1.17 with licensee representatives, it was learned there are no plans to arm protective personnel (This is identified as a Program Weakness in the Report Details section of this report). Also, it appears that the size of the plant protection force may not be adequate to fulfill the responsibilities and duties outlined in the DAEC Security Procedures.

6. Install intrusion alarm system meeting level of reliability and performance specified in Interim Federal Specification WA-00450A - on doors or portals of vital buildings or areas within the protected area - Establish response procedures.

The intrusion alarm system had not yet been completely installed or tested. The components and monitors appear to meet the GSA specifications. Completion of installation and testing of the alarm system was scheduled for February 4, 1974.

Annunciator panels, emitting an audible signal and displaying a digital readout of alarm activation location, have been installed in the Control Room and SCP. Response procedures have been formulated.

7. Establish a redundant means of communications in the Control Room and SCP.

Following are the communications capabilities which have been installed and are operational:

- On-site telephone
- Off-site telephone
- Microwave to IELP dispatcher (Control Room Only)
- On-site radio communication
- Off-site radio with LLEA
- Internal Public Address System

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8. Install Protective Lighting System

The perimeter of the protected area, as well as the perimeter of the

remote intake structure, have been equipped with protective lighting. The level of illumination provided is adequate.

9. Provide emergency power for security systems (alarms, radio and lighting)

Should the primary source of power, (the DAEC switchyard), be lost, emergency power is available for the alarm system and the radios to assure continuing operation. This secondary power source comes from an emergency diesel generator. Power available from this secondary source is insufficient to provide power to the exterior lighting. In the remote event of complete inoperability of the switchyard, increased patrols of the fence would be made and portable generators would be secured until lighting is restored. (This is identified as a Program Weakness in the Report Details section of this report).

10. Establish records and procedures concerning visual and physical testing of security devices

DAEC has generated Security Procedures SP-9, 10 and 11 which provide for visual and physical tests of security devices and for maintenance of required records.

Subsequent to this inspection, it was established by the Principal Inspector, Duane C. Boyd, that prior to core load authorization, DAEC substantially or completely implemented Findings 2, 4, 5 and 6.

It is concluded that DAEC's preparations for the protection of the facility against industrial sabotage have been substantially completed and there is reasonable assurance that activities to be authorized by the operating license will be conducted in compliance with AEC regulatory requirements.

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Introduction

The follow-up preoperational industrial security inspection was conducted on January 29-30, 1974, to ascertain actions taken by DAEC on the ten findings resulting from the initial inspection (RO Inspection Report No. 050-331/73-10).

Contacts at DAEC were:

G. G. Hunt, Chief, Engineer
Ellery Hammond, Assistant Chief Engineer (Security Officer)
Kenneth Vanous, IELP Corporate Nuclear Group Leader

Mr. Hunt continues to have overall responsibility for the Industrial Security Program with Mr. Hammond responsible for day-to-day implementation. Respective shift supervisors are alternate security officers in the absence of Messrs. Hunt and Hammond. Mr. Vanous, former Assistant Chief of Police at Cedar Rapids, was recently hired by IELP Corporate Headquarters to provide DAEC with assistance in selecting and training protective personnel, conducting security training for site personnel and off-site assistance agencies, and for establishing and maintaining liaison with law enforcement agencies.

During this inspection Messrs. Hammond and Vanous provided escort and furnished appropriate supplemental information and records related to the DAEC security plan and implementing procedures. At the conclusion of the inspection, discussion of the program weaknesses was held with Messrs. Hunt, Hammond, Ward and Vanous. Total station complement is 81 DAEC employees with approximately 700 construction contractor employees who will be phased out gradually as construction is completed.

Physical Barriers

Pending construction completion, Bechtel will continue to provide Pinkerton protective personnel to man three perimeter gates, the main outer gate, an IELP-DAEC personnel gate and a construction gate. The main entrance of the Administration Building, the Security Control Point, will be manned as of February 4, 1974, by hand-picked Pinkerton personnel pending the training and assignment of DAEC-employed watchmen to man this post.

Within the building internals, posts are manned by Pinkerton personnel on the Fuel Floor, Off-Gas Room, Dry Well and Control Room. All DAEC, IELP and construction personnel will be issued photoidentification badges which must be worn while on site. Additionally, access lists containing the names of authorized personnel will be utilized at internal posts to assure that only authorized personnel are permitted entry.

The security fences surrounding the protected area and the Intake Structure have been completed. The base of the fence has been backfilled and the drain

lines under the fence have been fitted with steel rebars wired to prevent spreading. The fence has been posted with "No Trespassing" signs at 100' intervals. Inside the fence of the protected area are temporary trailers and buildings which are within the isolation zone and construction debris was noted both inside and outside of the fence. The DAEC Security Plan, Section 2.1.1.2, states that the isolation zone (10 feet inside and 25 feet outside the fence) is maintained clear of all objects that could be used to conceal a person. The temporary trailers and structures are utilized to house construction personnel and equipment. Assurances were provided that as soon as construction is completed, the trailers would be removed, the temporary buildings dismantled and the scrap and rubble removed from both sides of fence. Drawings of the plant site and first floor layout are attached as Exhibits A and B. Work was being completed in the SCP by installation of controls for electrical sticker locks for the employee and visitor entrances. Also, the alarm annunciator and off-site radio were installed but not completely tested for effectiveness and operability. It was determined by the principal inspector, subsequent to this inspection, that the SCP construction has been completed, the post is manned to control access and the alarm annunciator and communications equipment were tested and are operable. A drawing depicting the security control point is attached as Exhibit C.

To observe the activities in the SCP, there is a CCTV camera positioned near the ceiling which views the watchman and the two portals through which persons enter. The monitor is situated in the Control Room.

A key control system has been formalized. The majority of sensitive keys will be stored in a locked cabinet in the Control Room and issuance will be controlled by the shift supervisor to assure that only authorized persons have key access solely in connection with their job activities. A limited number of keys for outbuildings will be stored in the SCP for issuance by the watchmen, but only upon prior verbal approval of the shift supervisor. Doors of vital areas and exterior leading doors which have hinges on the outside have been modified by insertion of a set screw on the hinge pin. When these doors are closed and locked the set screw is not susceptible to removal. Key cores have not been changed to date since no keys have been lost or other wise been out of the key control system. These cores will be changed when construction personnel vacate the site.

Personnel Identification and Control

The DAEC badge system described in RO:III Inspection Report No. 50-331/73-10 is unchanged.

At the time of this inspection it was observed that photographs were being taken of employees and construction workers and plastic laminated badges were being fabricated. The badges were to be issued on February 4, 1974, and the control system placed in effect on that day. Implementation was verified by the principal inspector during a subsequent inspection.

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Protective Personnel

Bechtel, the construction contractor, is contracting with Pinkerton for the services of 32 watchmen, including three females. Three gates on the outer fence line leading from the parking areas are continuously manned. In addition, internal posts are manned to control personnel access, mainly for construction personnel who are badged and whose names are on access lists.

As a temporary measure, DAEC will utilize six Pinkerton personnel to man the SCP post pending the hire and training of a DAEC protective force. Mr. Vanous advised that four watchmen will be hired as of February 4, 1974 and two more on February 11, 1974. Their training will last one week and, when trained, the DAEC employed force will man the SCP. The force will be uniformed but there are no plans for arming the force. The content of Regulatory Guide 1.17 with respect to having an on-site uniformed and armed protective force was discussed with DAEC and IELP representatives. While there are mixed feelings on arming the protective force, the consensus indicated that unless required by regulation, the force will not be armed.

DAEC plans to have protective force of six men. Two will be on the day shift because of the volume of personnel and vehicular traffic. One man will be on each of the evening and night shifts and on weekends and holidays. Whenever two protective personnel are on a shift, one will conduct fence patrols. On back shifts, some patrols will be conducted by operating personnel who act as watchmen. DAEC Security Procedures SP-5, SP-9 and SP-10, outline several duties and responsibilities of Security Guards, including conducting patrols, responding in emergency or security conditions and performing of tests. A question is raised as to the ability to provide continuous manning of the SCP, the secondary alarm station. It appears that the proposed size of the plant protection force may not be adequate to fulfill the duties and responsibilities outlined to the Security Procedures. Written general and post orders have not been issued but will be prepared and maintained in the SCP. Supervision of the force members will be exercised by Mr. Hammond or by respective shift supervisors in his absence.

Training for the force will be imparted by Mr. Vanous. Periodic training sessions will be held to assure familiarity with orders, duties and responsibilities.

Candidates for the DAEC protective force have been screened through several personal interviews and by verification of their past employment record. Police record checks were made and rigid physical examinations conducted.

Protective Alarms

At the time of this inspection work was progressing on the installation of intrusion alarms on exterior leading doors of the power block building. Alarms had been installed at the Pump House, Intake Structure and the Off-Gas Stack fence portal. While visual and audible annunciators had been installed in the Control Room and SCP, the complete alarm system had not been tested.

Subsequent to this inspection, it was verified by the Principal Inspector that the alarm system had been completed and tested for sensitivity and effectiveness.

Portals are protected by Kiddie magnetic contact or toggle-switch alarms. The alarms monitors at the Control Room and SCP are Minimax Model #200 manufactured by American Multiplex Systems, Inc. The monitor emits a distinctive audible signal and a display panel shows a digital readout of the violated portal and zone. There are twenty protected portals in five protected zones in the alarm system. (See Exhibit D).

Emergency power for the alarm system is provided by an emergency diesel power generator which automatically assumes power demands in the event of failure of the primary source.

Communications

There are several means for on-site and off-site communications. Available are the conventional telephones, a microwave link with the IELP load dispatcher, an on-site radio, an off-site radio and the internal public address system.

Radio transceivers have been installed in the Control Room and SCP. Transceivers are 100 Watt Motorola with a range of 20 miles. They operate on 155.37 megacycles. The base station call letters are KVJ-952 and the assigned frequency permits direct contact with the Linn County Sheriff's Office, the Civil Defense, Iowa Highway Patrol Headquarters in Cedar Rapids and the Cedar Rapids Fire Department. These transceivers are to be used for emergency purposes only. The system has been tested on four occasions with satisfactory results. Test frequency will be at the beginning of each work shift once DAEC becomes operational.

There is also a 30 Watt base station for on-site communications. Portable radio transceivers will be carried by protective and operating personnel when making protective or surveillance rounds.

Protective Lighting

Since the final configuration of the protected area fence has been established, protective lighting has been installed to assure adequate illumination of the fence line and isolation zone.

Light standards are 60' to 100' Holophane Hymount galvanized steel poles with underground power cables. The 60' poles have two luminaries while the 100' poles have five luminaries. The lamps are 1000 Watt Metal Haloide. Illumination provided measures 0.2 fc at the perimeter fence, 1.0 fc at the roadway, 0.4 fc for the plant area, 0.2 fc at the intake structure and 1.0 to 4.5 fc at the cooling tower fan deck.

The protective lighting system has no emergency power source but feeds directly from the switchyard. Emergency diesel generators have the capability of providing power to vital plant systems, including intrusion

alarms and radios, but have insufficient reserve power to be tied into the exterior lighting system. It was agreed with licensee representatives that should power from the switchyard be lost, increased fence patrols would be made or portable generators would be utilized pending restoration of power.

Personnel Selection

No changes to report (See RO:III Inspection Report No. 505-331/73-10.)

Personnel Training

For the past several weeks, training programs have been held with IELP, DAEC and construction employees with primary emphasis on safety, evacuation and emergencies. Covered during these sessions were security requirements and site access controls.

Regularly assigned site employees were recently given a security orientation which included discussion of the Security Plan and implementing procedures. As the protective force is hired, special training regarding their security duties and responsibilities will be accorded. Written guidance and protection force orders will be provided to them.

Visitor Control

No changes to report (See RO:III Inspection Report No. 050-331/73-10.)

General

DAEC has developed Security Procedure SP-5, "Security Alert," which describes the actions to be taken in the event of any condition which is considered to be a threat or significant risk to the security of the DAEC plant. Included in this procedure are bomb threats, civil disturbances and sabotage. Responsibility for implementing the procedures is vested with Messrs. Hunt and Hammond or with respective shift supervisors in their absence. Responsibility for investigating unusual or suspicious incidents rests with Mr. Hammond who will determine the cause, effect on plant operations, effectiveness of existing procedures and employee training and the means for effecting corrective actions.

Comments

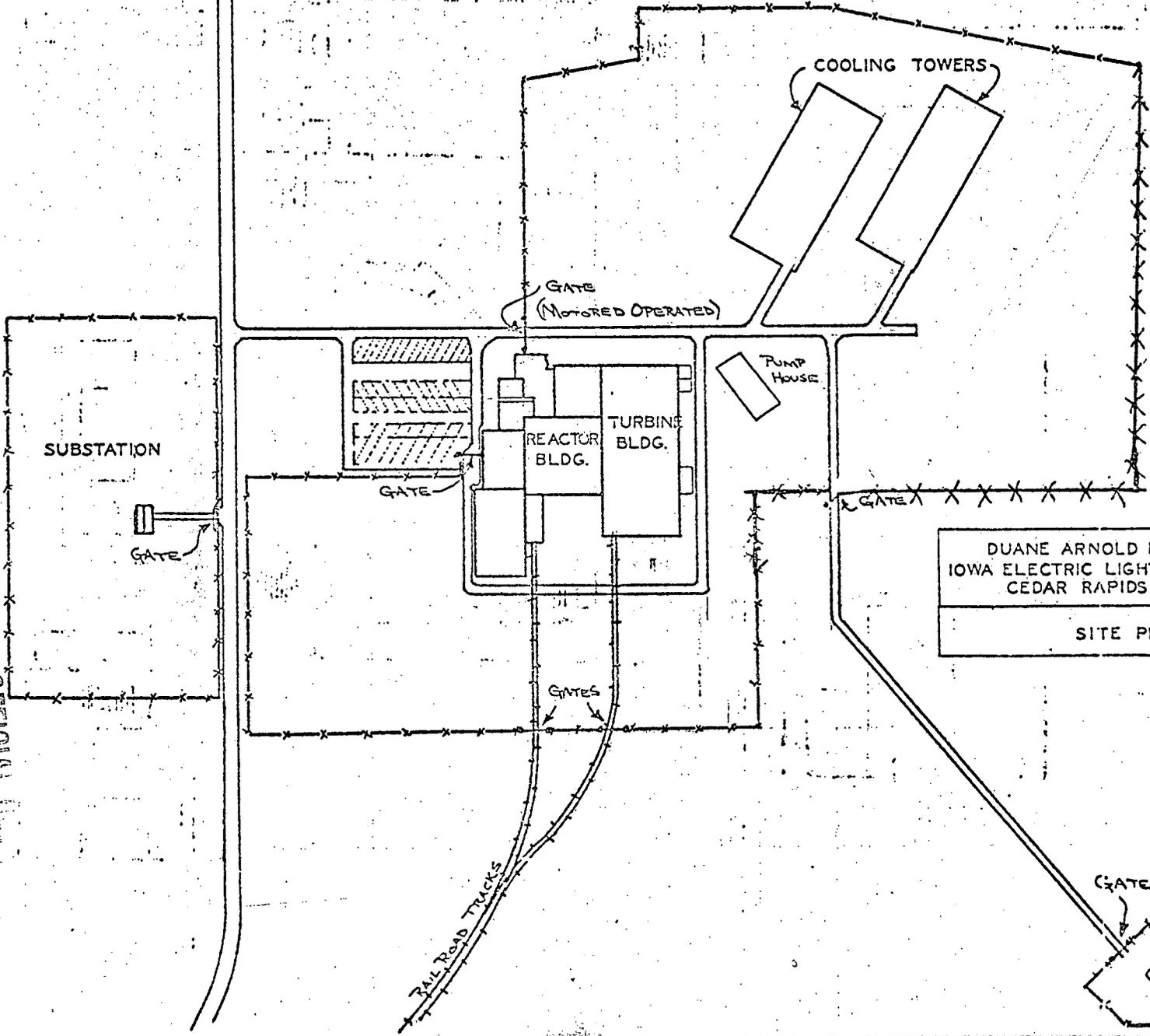
From the inspection results, assurances from DAEC management that incompleted findings would be implemented and the verification of actions developed by the principal inspector, it is concluded that DAEC's preparations for the protection of the facility against industrial sabotage have been substantially completed. The program weaknesses disclosed by this inspector were referred to the licensee for further comment.

Attachments:
Exhibits A through D

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EXHIBIT A

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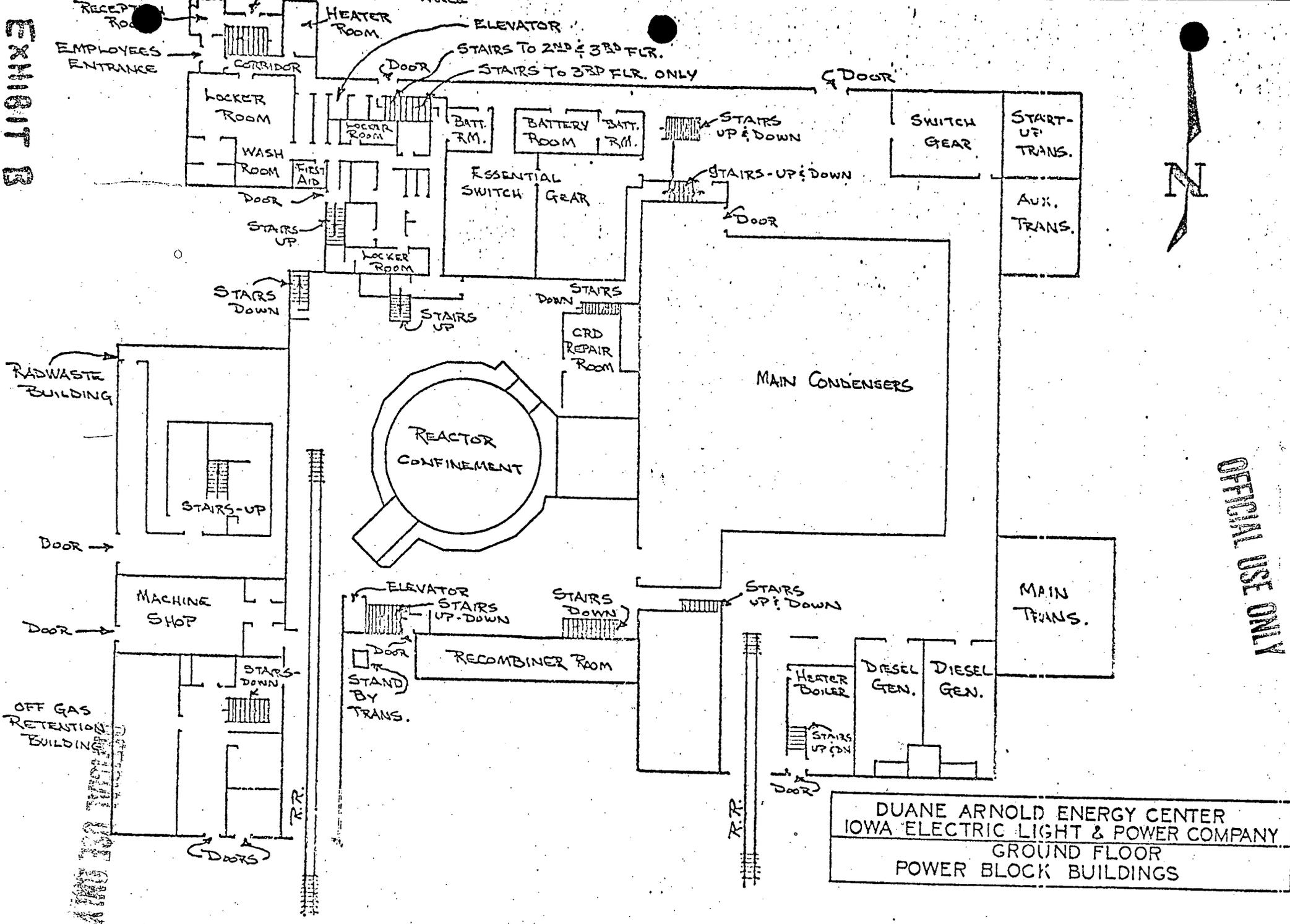
DUANE ARNOLD ENERGY CENTER
IOWA ELECTRIC LIGHT & POWER COMPANY
CEDAR RAPIDS, IOWA

SITE PLAN



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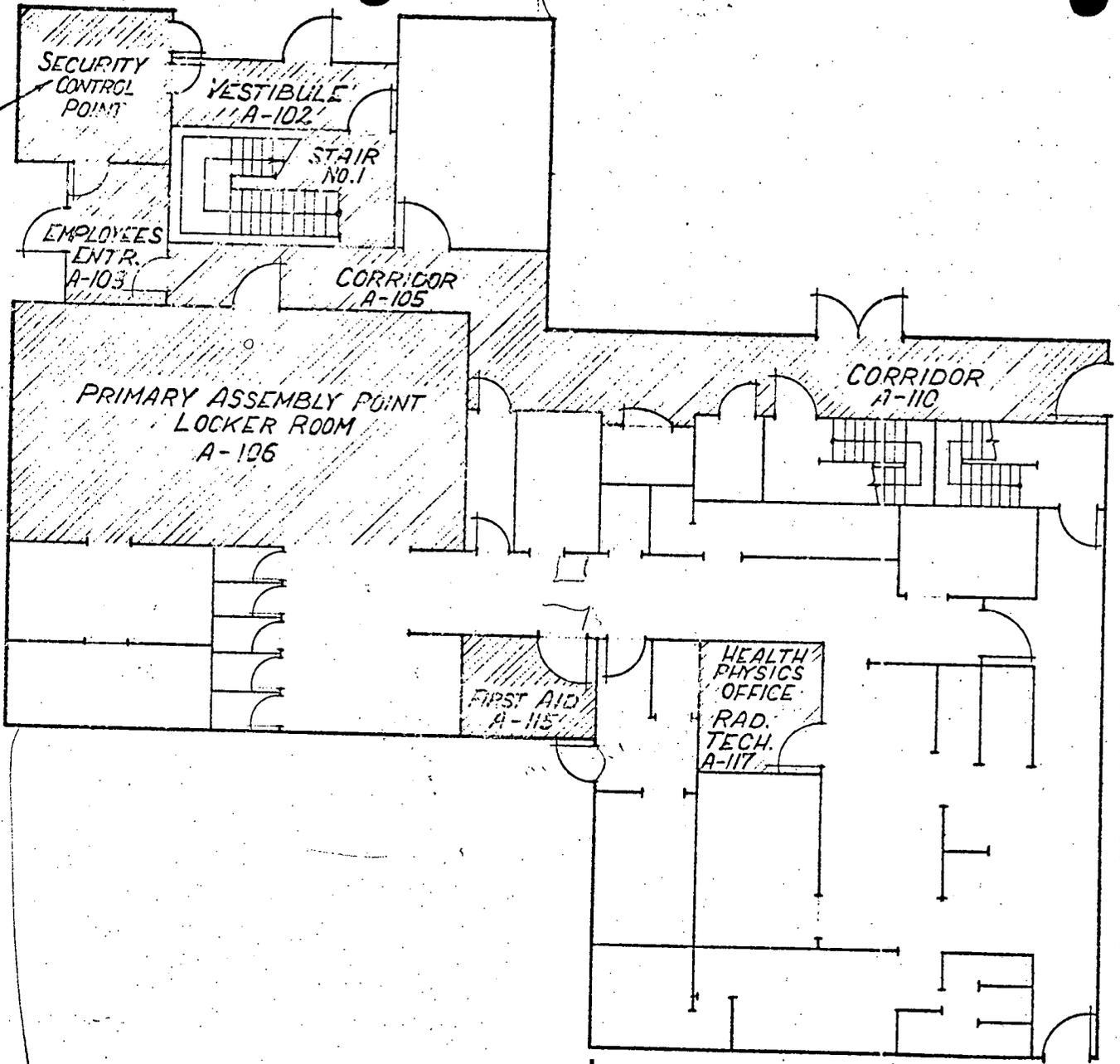
EXHIBIT B



DUANE ARNOLD ENERGY CENTER
 IOWA ELECTRIC LIGHT & POWER COMPANY
 GROUND FLOOR
 POWER BLOCK BUILDINGS

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EXHIBIT C

DUANE ARNOLD ENERGY CENTER IOWA ELECTRIC LIGHT & POWER COMPANY PREPAREDNESS PLAN
Emergency Coordination Center FIGURE 4.0-1

INTRUSION ALARM SYSTEM

<u>LOCATION</u>	<u>ZONE 1</u>	<u>ZONE 2</u>	<u>ZONE 3</u>	<u>ZONE 4</u>	<u>ZONE 5</u>	<u>ZONE 8</u>
01	Admin. Bldg. Door #108	Admin. Bldg. Door #109				Trouble Location #01
05	Rad. Bldg. Door #302					Trouble Location #05
06	R. B. R. R. Air Lock Door #240	Machine Shop Door #70Q	Machine Shop Door #701	O. G. Ret. Bldg. Door #710		Trouble Location #06
07	Recombiner Bldg. Door #243					Trouble Location #07
11	Turb. Bldg. Door #124					Trouble Location #11
12	Turb. Bldg. Door #136	Turb. Bldg. Door #137				Trouble Location #12
20	Pumphouse Door #500	Pumphouse Door #501	Chlorine Rm. Door #508	Chlorine Rm. Door #509	Chlorine Rm. Door #510	Trouble Location #20
25	O. G. Stack Wire Gate					Trouble Location #25
30	Intake Struc. Door #601	Intake Struc. Door #602	Intake Struc. Scuttle			Trouble Location #30

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EXHIBIT D

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