

*Reactor Facilities
Branch*

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

FEB 3 1976

Iowa Electric Light and Power
Company
ATTN: Mr. J. A. Wallace
Vice President-Generation
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Docket No. 50-331

Gentlemen:

Thank you for your letters dated January 6 and January 20, 1976, informing us of the steps you have taken to correct the items of noncompliance with Technical Specifications requirements and deviations from written commitments which we brought to your attention in our letter dated December 23, 1975. We will examine these matters during a subsequent inspection.

Your actions pursuant to resolution of open items identified in previous inspections will also be examined during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

James G. Keppler
Regional Director

cc: Mr. Duane Arnold
President

bcc w/ltrs dtd 1/6/76 and
1/20/76:

PDR

Local PDR

NSIC

TIC

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IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

January 6, 1976

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to NRC Office of Inspection and
Enforcement letter, dated December 23,
1975.

File: A-110b Inspection 75-19

Dear Mr. Keppler:

This letter is in response to your letter of December 23, 1975 concerning an inspection of activities at the Duane Arnold Energy Center conducted on November 18-21, 1975. The following responses indicate the actions which have been or will be taken to correct the infractions and deficiencies noted in your letter, when appropriate:

A. Infraction

Contrary to DAEC Technical Specification 6.8.4 selected drills of emergency procedures were not conducted in accordance with the provisions of the Preparedness Plan. Drills were not conducted for the first and third quarter of 1975. (Section 5.e, Report Details)

Response

A contributing factor to this infraction was that the Preparedness Plan Implementation Procedures did not require a quarterly radiation emergency exercise.

- 1) A radiation emergency exercise was conducted on December 19, 1975.
- 2) A revision to the Preparedness Plan Implementation Procedures will require a quarterly radiation emergency exercise.
- 3) Corrective action will be completed by January 15, 1976.

1976

January 6, 1976

B. Deficiencies

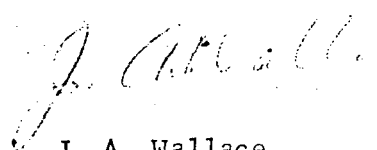
Contrary to DAEC Technical Specifications 6.8.1.7 during the May 29, 1975 site emergency drill, Preparedness Plan Implementation Procedure No. PPIP-16, requiring all drill observers to record and document observations was not followed. (Section 5.e, Report Details)

Response

Drill observers did record observations, but the individual observations were not retained. They were combined into one set of observations for all observers.

- 1) Corrective steps for previous emergency exercises is inappropriate.
- 2) The appropriate plant personnel will be reinstructed as to the requirement to comply with the Preparedness Plan Implementation Procedures.
- 3) Corrective action will be completed by January 31, 1976.

Very truly yours,


J. A. Wallace
Vice President-Generation

JAW:ar

c.c. Mr. D. Arnold
Mr. G. Hunt
Mr. E. Hammond
Mr. L. Liu
Mr. D. Wilson
Mr. L. Root
Mr. H. Rehrauer
Mr. G. Cook
Mr. K. Meyer
Mr. J. Newman

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

January 20, 1976

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to NRC Office of Inspection
and Enforcement letter, dated
December 23, 1975.

File: A-110b Inspection 75-19

Dear Mr. Keppler:

This letter is in response to your letter of December 23, 1975 concerning an inspection of activities at the Duane Arnold Energy Center conducted on November 18-21, 1975. This letter is in addition to a previous response in which two deficiencies were inadvertently omitted from our response. The following responses indicate the actions which have been or will be taken to correct the infractions and deficiencies noted in your letter, when appropriate:

E. Deviation

1. DAEC Preparedness Plan Sections 7.1, 7.4, 7.7, 7.11 and 11.1 state liaison will be continuously maintained with specified state and local agencies responsible for public safety. Letters of Agreement were not received from the Cedar Rapids Fire Department and the Environmental Protection Agency. Letters of Agreement, which are presently out of date, were noted for the Palo Fire Department and ERDA (Section 4, Report Details).

Response

- 1) Letters of Agreement with the appropriate support agencies have been requested. The Preparedness Plan has been reviewed and changes will be submitted for approval, updating the listed agencies that would provide support during a radiation emergency.
- 2) Letters of Agreement with all support agencies will be requested during December each year.
- 3) Corrective action will be completed by 1 May 1976.

1976

E. Deviation

2. Contrary to the commitment of DAEC Plan Section 11.1, no annual reviews of the Preparedness Plan have been conducted since 1972.

Response

- 1) A review of the Preparedness Plan was conducted in December 1975 by the Radiation Protection Engineer and Licensing Engineer. Recommended changes to the Preparedness Plan will be submitted to the Operations Committee and Safety Committee for review and approval.
- 2) A review of the Preparedness Plan will be conducted as a part of the annual radiation emergency exercise.
- 3) Corrective action will be completed by 30 June 1976.

3. Status of Items Identified in Previous Inspectionsa. Public Address, Fire and Evacuation Alarm System Test

The licensee conducted system audibility evaluations which concluded that the PA system and evacuation/fire alarms are audible during plant operation. However, during the May 29, 1975 evacuation drill, several employees and subcontracted personnel stated that the PA system and the evacuation alarm were inaudible or barely distinguishable at various work locations in the plant. Although the employees' and subcontracted personnel's comments were noted by the licensee during the drill critique, there has been no subsequent action by the licensee.

Response

- 1) A review of personnel's comments were conducted to identify the areas that the PA was inaudible. Those areas identified will be evaluated to determine if additional speakers would correct the problem. An accountability is used during evacuation to determine if all personnel have evacuated.

3. Status of Items Identified in Previous Inspectionsb. Alternate Emergency Coordination Center (AECC)

The commitment to provide to NRC by 1 June 1974, a review and evaluation of the AECC was met on 26 May 1974. The licensee stated at that time that the final plan should be completed 1 July 1974. A review of the authorized work orders indicated the plan was approved 1 January 1975. At the time of this inspection, the work on the AECC had not been completed. A completion date, when the AECC will be fully operational, has not been established by the licensee.

January 20, 1976

Response

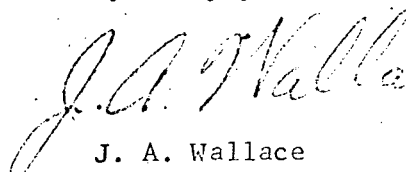
The work on the Alternate Emergency Coordination Center will be completed by 1 April 1976.

With respect to your concern for our system of management control in the area of emergency planning, the following information is offered:

- a) The Assistant Radiation Protection Engineer's position has been filled by the appointment of Mr. George Kuehn. Mr. Kuehn has experience for this department which will add to the effectiveness in emergency planning.
- b) All commitments will be added to the Master Punch List so that NRC licensed activities will be monitored more closely.

It should be noted that in our previous correspondence dated January 6, 1976, an inadvertent error was made on page 2 indicating January 31, 1976 instead of December 31, 1975 for completion of personnel reinstruction in drill observation. We regret any inconvenience this error may have caused you.

Very truly yours,


J. A. Wallace
Vice President-Generation

JAW:ar

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