

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

JAN 7 1976

Iowa Electric Light and
Power Company
ATTN: Mr. Duane Arnold
President
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Docket No. 50-331

Gentlemen:

Thank you for your letter dated December 31, 1975, informing us of the steps you have taken to correct the items of non-compliance which we brought to your attention in our letter dated December 12, 1975. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

cc: G. G. Hunt, Chief Engineer

bcc w/ltr dtd 12/31/75:
PDR
Local PDR
NSIC
TIC

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

December 31, 1975

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
12, 1975.

File: A-110b Inspection 75-18

Dear Mr. Keppler:

This letter is in response to your letter of December 12, 1975 concerning an inspection of activities at the Duane Arnold Energy Center conducted on November 19-21, 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:

B. Infraction

Contrary to Paragraph 6.8.3 of the Duane Arnold Technical Specifications and the licensee Administrative Procedure 1402.2, Paragraph 6.3.4, Temporary Changes to procedures were not promptly reviewed by the Operations Committee or reviewed by the Chief Engineer. (Paragraph 2.b(1)(b), Report Details)

Response

- 1) The ten DCF's have been signed by the Chief Engineer which is evidence of his review.
- 2) Staff personnel have been reinstructed as to the requirement to have the Operations Committee promptly review all temporary procedure revisions. The Operations Committee chairman will assure upon signing a DCF involving a temporary revision that the Chief Engineer reviews the DCF immediately.
- 3) Personnel reinstruction will be completed by January 2, 1976.

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C. Deficiencies

1. Contrary to 10 CFR, Part 50, Appendix B, Criterion VI and the licensee Quality Assurance Directive 1305.1, Paragraph 5.7.1:

- a. The licensee failed to maintain Operating Instructions (OI's) current with Technical Specification changes. (Paragraph 2.b(2), Report Details)

Response

- 1) Due to the nature of this deficiency, a consultant has been hired to make a complete review of all controlled procedures including the status of the Operating Instructions relative to the Technical Specifications, temporary and permanent procedure revisions.
 - 2) In order to avoid future non-compliance, the consultant will be instructed to revise the Operating Instructions when the Technical Specifications are changed.
 - 3) The Operating Instructions will be revised to conform to the latest Technical Specifications by March 1, 1976.
- b. Failed to update controlled copies of procedures with latest approved revisions. (Paragraph 2.b(1)(d), Report Details)

Response

- 1) As stated in C.1.a.1) above, a consultant has been hired to review the status of all controlled procedures.
 - 2) Arrangements have been made to acquire temporary clerical assistance when revisions are made to controlled procedures so an orderly update will be in effect.
 - 3) Controlled copies of procedures will be updated with the latest approved revisions by March 1, 1976.
2. Contrary to 10 CFR, Part 50, Appendix B, Criterion V, the licensee failed to comply with its Quality Assurance Manual and Administrative Control Procedures as follows:
 - a. Failed to incorporate Temporary Procedure Revisions into Permanent Revisions within the 30 days required by Quality Assurance Directive 1306.3, Paragraph 5.7 and ACP 1402.2, Paragraph 5.1.7. (Paragraph 2.b(1)(c), Report Details)

Response

- 1) The seven temporary revision DCF's have been incorporated into permanent revisions.

- 2) The Administrative Supervisor has been reinstructed as to the requirement to incorporate temporary revisions into permanent revisions within 30 days. In order to differentiate between a temporary and permanent revision, the DCF log has been changed to designate which changes are temporary.
 - 3) Reinstruction and the log change has been completed by January 2, 1976.
- b. Failed to attach the required procedure approvals to the Master Procedure in accordance with ACP 1402.3, Paragraph 5.19. (Paragraph 2.b(3), Report Details)

Response

- 1) Due to the nature of being deficient in not having a Master Index or not having approval signatures attached to the Master Procedures, no corrective actions are appropriate.
 - 2) The Administrative Supervisor has been reinstructed as to the requirement of a Master Index. The Administrative Control Procedure 1402.3 will be changed to reflect the fact that documents that have required approvals are kept in a separate file cabinet and are not attached to the master document.
 - 3) Reinstruction of the Administrative Supervisor was completed by January 2, 1976 and the Administrative Control Procedure 1402.3 will be revised by January 15, 1976.
- c. Failed to annotate or attach the Control Room copies of Quality Instructions approved Temporary Revisions as required by Quality Assurance Directive 1306.3, Paragraph 5.6 and ACP 1402.2, Paragraph 5.1.10. (Paragraph 2.b(1)(d), Report Details)

Response

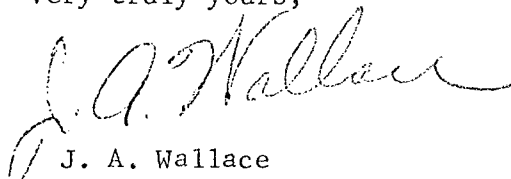
- 1) The five DCF's for temporary revisions have been made into permanent revisions and have been incorporated into the master procedure and control room copy of the Operating Instruction.
 - 2) The Administrative Supervisor has been reinstructed as to the necessity for assuring as a minimum that temporary and permanent procedure changes are incorporated into their master and control room copy of documents.
 - 3) Reinstruction of the Administrative Supervisor was completed by January 2, 1976.
3. Contrary to Paragraph 6.10.1.4 of the Technical Specifications, documentation of the Intermediate Range Monitor (IRM) calibrations required by Table 4.1-2 of the Technical Specifications was not available. (Paragraph 4.d, Report Details)

December 31, 1975

Response

- 1) Due to the nature of the deficiency being the lack of documentation of a calibration that was performed, no corrective action is appropriate.
- 2) Table 4.1-2 of the Technical Specifications requires a visual comparison of the IRM indication to the APRM indication during a controlled shutdown. As this comparison is visual in nature, no documentation was provided, however, a statement will be added in the shutdown Surveillance Test Procedure package that refers to the appropriate IPOI section for the IRM-APRM documented comparison.
- 3) The statement for assuring that the visual comparison is made was added to the Surveillance Test Procedure shutdown package by January 2, 1976.

Very truly yours,



J. A. Wallace
Vice President-Generation

ELH/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