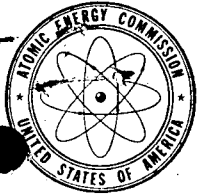


DR Central Files



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

TELEPHONE  
(312) 858-2660

October 27, 1972

Iowa Electric Light and Power Company  
ATTN: Mr. Charles W. Sanford  
Vice President, Engineering  
Security Building  
P. O. Box 351  
Cedar Rapids, Iowa 54205

Docket No. 50-331

Gentlemen:

This letter refers to an inspection conducted by Messrs. Boyd and Hunnicutt of this office on October 4 and 5, 1972, of activities at the Duane Arnold Energy Center authorized by AEC Construction Permit No. CPPR-70, and to the discussions of our findings held by Messrs. Boyd and Hunnicutt with Messrs. Hunt and York of your staff at the conclusion of the inspection. Our findings were also discussed by Mr. Boyd with Mr. Hunt by telephone on October 26, 1972.

Areas examined during the inspection included your proposed preoperational testing program; the operations organization training program; your Operating Organization Quality Assurance Program; and site preparedness and security programs. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

During this inspection, it was found that certain of your activities appear to be in noncompliance with AEC requirements or in nonconformance with promulgated AEC Guides. These items and reference to the pertinent requirements are listed in the enclosure to this letter.

This letter is a notice of violation sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Such a statement or explanation should be provided for each of the items listed in the enclosure.

To assist us in planning our inspection program during the preoperational test period, we request that you provide us with copies of your

Iowa Electric Light and  
Power Company

- 2 -

October 27, 1972

"acceptance tests" in the same manner that you are providing us with copies of your preoperational test procedures. This information is requested only to facilitate our inspection effort; therefore, any documents sent to us pursuant to this request will not be placed in the Public Document Room and will be returned to you upon completion of our review.

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

Sincerely yours,

Boyce H. Grier  
Regional Director

**Enclosure:**

**Description of Noncompliance/Nonconformance Items**

bcc: RO Chief, RT&OB  
RO Chief, RCB  
RO:HQ (4)  
Licensing (4)  
DR Central Files  
PDR  
Local PDR  
NSIC  
DTIE

ENCLOSURE

IOWA ELECTRIC LIGHT AND POWER COMPANY  
DOCKET NO. 50-331

A. Certain activities under your license appear to be in noncompliance with AEC requirements as indicated below:

1. 10 CFR 50, Appendix B, Section XI, states, in part, that "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service . . . Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Contrary to the above, IELP has not provided documentation and information to demonstrate that an acceptable testing program has been established. Specifically, IELP has acknowledged that all preoperational tests and "Acceptance Tests" will not be managerially and administratively controlled in the same manner and that the degree of IELP involvement in the review, approval, and participation in these tests will vary, but the differences in controls and IELP involvement have not been identified. Also, IELP has not identified which of these "Acceptance Tests" will be administratively controlled in a different manner, or will involve a different degree of IELP involvement than is currently defined for preoperational testing.

2. 10 CFR 50, Appendix B, Section XVIII, states, in part, that "A comprehensive system of planned and periodic audits shall be carried out . . . by appropriately trained personnel not having direct responsibilities in the areas being audited. Audit results shall be documented and reviewed by management having responsibility in the area audited."

Contrary to the above, IELP has not provided documentation and information to demonstrate that a comprehensive system of planned and periodic audits is intended. Specifically, IELP has failed to establish the degree of IELP involvement in audit of the various facility testing activities.

B. Certain activities under your license appear to be in nonconformance with an AEC Guide as indicated below:

The "Guide for the Planning of Preoperational Testing Programs" issued December 7, 1970, states, in part, "The preoperational testing program, as the term is used in this Guide, includes the tests conducted to demonstrate the capability of structures, systems, and components to meet safety-related performance requirements. In broader context, preoperational testing includes a number of

of other considerations of technical, contractual, or financial interest to the owner, and tests directed toward these considerations may be integrated into the overall preoperational testing program. This Guide (emphasis added) and the interest of the AEC, however, are limited to the safety-related aspects of the program. From the Commission's standpoint, the program should demonstrate that the plant is ready to operate in such a way that it will not endanger the health and safety of the public, that the procedures for operating the plant safely have been tested and demonstrated, and that the operating organization is knowledgeable about the plant and procedures and fully prepared to operate the facility safely."

The guide provides an Appendix which lists typical systems, components, or tests to be considered in development of preoperational testing program for water cooled reactors.

Contrary to the guide, the preoperational testing program planned for Duane Arnold does not include provisions for preoperational testing of the following safety related systems:

- Fire Protection Systems
- Communications Systems
- Instrument Air System
- Radioactive Waste Systems
- Area Radiation Monitoring System
- Feedwater and Feedwater Control Systems
- Turbine Control and Bypass Valves
- Condenser Circulating Water System
- Component Cooling Systems (Partial)
- Reactor Building Ventilation System
- Auxiliary Building Ventilation System
- Spent Fuel Cooling System