

JUL 5 1978

Docket No. 50-331/78-7

Iowa Electric Light and Power
Company

ATTN: Mr. Duane Arnold
President

IE Towers
P.O. Box 351
Cedar Rapids, IA 52406

Gentlemen:

Thank you for your letter dated May 10, 1978, informing us of the steps you have taken to correct the item of noncompliance which we brought to your attention in IE Inspection Report No. 50-331/78-07 forwarded by our letter dated April 26, 1978. Based on discussions with your representatives at the site on June 2, 1978, we understand that you now have established October 1, 1978 as a target date when full compliance will be achieved and that you will provide written justification before October 1, 1978 if full compliance cannot be achieved by that date.

Your cooperation with us is appreciated.

Sincerely,

A. B. Davis, Chief
Fuel Facility and Materials
Safety Branch

cc: J. A. Wallace
Vice President-Generation
Mr. E. L. Hammond, Chief
Engineer

cc w/ltr dtd 5/10/78:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR

61

NSIC					
OFFICE	RIII <i>dm</i>	RIII <i>WLF</i>	RIII <i>ABD</i>		
SURNAME	Miller/dal	Fisher	Davis		
DATE	6-30-78	6-30-78	6-30-78		

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

May 10, 1978

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

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

Subject: Letter dated April 26, 1978 from Mr. A. B. Davis
to Mr. Duane Arnold concerning IE Inspection 78-07

File: A-102 Inspection Report 78-07

Dear Mr. Keppler:

This letter is in response to Mr. A. B. Davis' letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on March 29-31, 1978. The following response indicates the action which has been or will be taken to correct the item of noncompliance identified in Mr. Davis' letter.

Infraction

Technical Specification 6.2.2.2.e requires that at least one member of each operating shift crew shall be qualified to implement radiation protection procedures.

Response

1. Corrective action taken and the results achieved:

In order to enhance the efforts of the Shift Supervising Engineer in the area of radiation protection, five additional personnel positions have been authorized for the Radiation Protection Department. The five positions have been filled by means of the bidding process in the bargaining unit.

2. Corrective action to be taken to avoid further noncompliance:

The additional five technicians will be trained for total department responsibilities in order to satisfy the Technical Specifications and manpower requirements for shift coverage in Radwaste, Chemistry and Health Physics.

MAY 15 1978

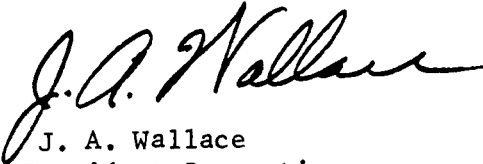
Response - Cont.

3. Date when full compliance will be achieved:

One member from the Radiation Protection Department will be assigned to a shift coverage schedule by January 1, 1979 in order to implement radiation protection procedures. This date will depend upon the stability of the department relative to the prerogative of bargaining unit personnel to accept other job postings.

It should be noted that since the inception of the plant operating personnel to the present time, we have been using the Shift Supervising Engineer and the Second Assistant Nuclear Station Operating Engineer quite satisfactorily as the personnel responsible for performing normal radiation protection functions during the backshifts. If an abnormal condition existed during the backshift, a radiation protection person was contacted for on-site assistance.

Very truly yours,



J. A. Wallace
Vice President-Generation

JAW/ELH/ar

c.c. Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

CENTRAL FILES



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

Docket No. 50-331 / 78-7

APR 26 1978

Iowa Electric Light and Power
Company
ATTN: Mr. Duane Arnold
President
IE Towers
P. O. Box 351
Cedar Rapids, IA 52406

Gentlemen:

This refers to the inspection conducted by Messrs. D. E. Miller and N. E. DuBry of this office on March 29-31, 1978, of activities at Duane Arnold Energy Center authorized by NRC Operating License No. DPR-49 and to the discussion of our findings with Mr. Hammond and others at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

The inspector also examined actions you have taken with respect to the matters identified in your letter dated December 21, 1977. We have no further questions regarding these matters.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

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Iowa Electric Light and
Company

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APR 26 1978

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

A. B. Davis, Chief
Fuel Facility and Materials
Safety Branch

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-331/78-07

cc w/encs:

Mr. E. L. Hammond, Chief
Engineer
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

OFFICE	RIII <i>WJ</i>	RIII <i>WJ</i>	RIII <i>WJ</i>	RIII <i>ASJ</i>	RIII
SURNAME	Miller/ls	DuBry	Fisher	Davis	Shaffer <i>WJ</i>
DATE	4/22/78			4/24/78	

Appendix A

NOTICE OF VIOLATION

Iowa Electric Light and
Power Company

Docket No. 50-331

Based on the inspection conducted on March 29-31, 1978, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. The item listed below is an infraction.

Technical Specification 6.2.2.2.e. requires that at least one member of each operating shift crew shall be qualified to implement radiation protection procedures.

Contrary to the above technical specification, not all operating shift crews contain at least one member who is qualified to implement radiation protection procedures.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-331/78-07

Docket No. 50-331

License No. DPR-49

Licensee: Iowa Electric Light and Power Company
IE Towers
P. O. Box 351
Cedar Rapids, IA 52406

Facility name: Duane Arnold Energy Center

Inspection at: Duane Arnold Site, Palo, IA

Inspection conducted: March 29-31, 1978

Inspectors: *for W.L. Fisher*
D. E. Miller 4/25/78

for W.L. Fisher
N. E. DuBry 4/25/78

Approved by: *W.L. Fisher*
W. L. Fisher, Chief 4/25/78
Fuel Facility Projects and
Radiation Support Section

Inspection Summary

Inspection on March 29-31, 1978 (Report No. 50-331/78-07)

Areas Inspected: Routine, unannounced inspection of operational radiation protection program during refueling and major maintenance, including: qualifications; training; planning and preparation; procedures; exposure control; posting, labeling, and control; surveys; respiratory protection program; and previous item of noncompliance. The inspection involved 40 inspector-hours on site by two NRC inspectors.

Results: Of the nine areas inspected, no items of noncompliance or deviations were identified in eight areas. One item of noncompliance was found in one area (Infraction - not all operating shift crews contain at least one member who is qualified to implement radiation protection procedures - Paragraph 5.)

DETAILS

1. Persons Contacted

E. Hammond, Chief Engineer
K. Young, Radiation Protection Engineer
G. Kuehn, Assistant Radiation Protection Engineer
E. Lange, Health Physics/Radwaste Supervisor
R. Decker, Radiological and Environmental Engineer
(Allied Nuclear, Inc.)

The inspector also contacted several plant and contract Health Physics Technicians during the inspection.

2. General

This inspection, which began with visual observation of access controls, postings, and work in progress in various controlled areas of the plant at 8:00 a.m. on March 29, 1978, was conducted to examine the radiation protection aspects of the current refueling and major maintenance outage, a previous item of noncompliance, and a previous unresolved item.

Several areas were revisited during the inspection to observe work in progress and radiological controls.

No significant abnormalities were noted during the visual observations.

3. Organization

The licensee has contracted about twenty-five additional radiation protection technicians and a supervisor for the duration of the refueling and maintenance outage.

The licensee has selected five individuals who will be trained as Health Physics/Radwaste Technicians. Some of those selected have had previous radiation training. The licensee intends to have a Health Physics Technician on each shift after adequate training is completed.

4. Licensee Action on Previous Inspection Findings

(Closed) Infraction (50-331/77-21): Concerning failure of certain licensee employees to comply with radiation work permit requirements. The inspector reviewed the licensee's response dated December 21, 1977. Through review of this response and discussions with licensee employees, the inspector determined that the licensee's corrective actions appear to be adequate.

(Closed) Unresolved Item (50-331/77-21): Concerning operating shift crew complement. This matter is discussed in the following paragraph.

5. Current Findings

During a previous inspection (50-331/77-21), in discussions with licensee plant management, the inspector learned that the licensee would not certify that at least one member of each operating shift crew is qualified to implement radiation protection procedures as required by Technical Specification 6.2.2.2.e., and defined in a letter dated February 18, 1977, from NRR to the licensee. Because of differences in interpretation of "individuals qualified to implement radiation protection procedures," this item was left unresolved.

Recent clarification from IE:HQ confirms the applicability of the criteria listed in the above letter. These criteria define the capabilities necessary for the individual to be qualified to implement radiation protection procedures. Because it is not apparent that at least one member of each operating shift is qualified to implement radiation protection procedures as required, this matter is considered an item of noncompliance.

6. Respiratory Protection Program

The following aspects of the licensee's respiratory protection program were selectively reviewed:

- a. Newly written radiation protection procedures concerning respiratory protection.
- b. Onsite orientation training.
- c. Medical physical requirements for onsite and contract employees.
- d. Use of approved equipment.
- e. Program and facilities for equipment maintenance and cleaning.
- f. Program and facilities for quantitative fit testing.
- g. Airborne radioactivity monitoring program including maintenance of records.
- h. Use of Radiation Work Permits, access control logs, and access controls to implement required respiratory protection equipment use.

- i. Use of engineering controls such as job site ventilation equipment to reduce potential exposure to airborne contaminants. Also, health physics review of future and past work to evaluate need for additional engineering controls.

No items of noncompliance with 10 CFR 20.103 were identified.

7. Orientation Training

The inspector attended a radiation protection orientation training class, which remains as previously described (50-331/77-21). The orientation training appears to fulfill the requirements of 10 CFR 19.12.

8. Surveys

Records of direct radiation, surface contamination, and airborne contamination surveys conducted during the refueling outage to date were reviewed. The inspectors discussed with the licensee his methods of identification and control of airborne contamination areas. No significant problems were identified.

9. In Vivo Counting

The licensee's whole body counting program remains as previously described (50-331/77-21). The inspector reviewed gross count records of counts performed during the current refueling outage. No abnormal results were noted and no problems were identified.

10. External Exposure Control

The licensee's exposure control program during this outage includes a daily updated dose tally for each worker. This tally is done by hand and is distributed to appropriate supervisors. Based on self-reading dosimeter readings, dose plateaus are established which cannot be exceeded without TLD readout. At present, TLD's must be sent to the vendor for readout.

Also, each worker has a card attached to his identification badge on which a running dose tally is maintained. This card also contains information concerning training, testing, and physical qualifications for respiratory protection equipment use.

11. Posting, Labeling, and Control

During the initial plant tour and other visits to areas of the plant, the inspectors noted that controlled area postings and control of high radiation areas complied with regulatory

requirements. The inspectors also reviewed the licensee's compliance with posting requirements specified in 10 CFR 19.11. No problems were identified.

12. ALARA

The licensee ALARA program remains as previously reported (50-331/77-21). The inspectors noted that radiation protection persons actively participate in work planning. Also, the inspectors noted that the licensee makes extensive use of work site HEPA filtered portable exhaust ventilation systems.

13. Exit Interview

The inspectors met with Mr. Hammond and others on March 30, 1978, and with Mr. Young at the conclusion of the inspection on March 31, 1978. The following matters were discussed:

- a. The scope of the inspection and past item of noncompliance concerning failure to follow RWP procedures.
- b. The item of noncompliance concerning staffing of each shift crew. (Paragraph 5) The licensee stated that the recent increase in radiation protection group staffing is aimed at providing health physics coverage on each shift crew after adequate training of the new technicians. (Paragraph 3)
- c. The inspectors stated that the health physics aspects of the refueling and maintenance outage are apparently being well performed.