

JUN 14 1978

Docket No. 50-331

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 letters dated April 28, 1978 and May 10, 1978, informing us of the steps you have taken to correct the noncompliance identified in our letter dated April 6, 1978. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Gaston Fiorelli, Chief
Reactor Operations and
Nuclear Support Branch

cc: Mr. E. L. Hammond, Chief
Engineer

cc w/ltrs dtd 4/28/78 and
5/10/78:

Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC

GD

OFFICE ▶	RIII	RIII	RIII	RIII	
SURNAME ▶	Shafer/dal	Menning	Knop	Fiorelli	
DATE ▶	6-12-78	6-12-78	6-12-78	6-12-78	

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

April 28, 1978

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

50-331/78-5
Mr. James G. Keppler, Director
Office of Inspection and Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Duane Arnold Energy Center
Subject: Response to Inspection Report 78-05
File: A-102 - Inspection Report 78-05

Dear Mr. Keppler:

This letter is in response to Mr. Fiorelli's letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on March 6-9, 1978. The following response indicates the actions which have or will be taken to correct the item of noncompliance identified in Mr. Fiorelli's letter.

Infraction

Based on the inspection conducted on March 6-9, 1978, it appears that certain of your activities were in noncompliance with NRC requirements. The item listed below is an infraction.

Contrary to 10 CFR Part 50, Appendix B, Criterion V and Iowa Electric Quality Assurance Directive (QAD) 1317.1, the records management system has not been fully implemented.

Response

1. Corrective action taken and the results achieved:

a) Administrative Control Procedure 1402.1 has been revised to reflect the requirements of Quality Assurance Directive 1317.1, Rev. 1. Administrative Control Procedure 1402.5 will be revised to reflect a date of commercial operation consistent with Quality Assurance Directive 1317.1, Rev. 1.

b) Administrative Control Procedures concerning Record Storage Facilities will be revised to more clearly reflect record storage

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requirements. Completion of the procedure revision is contingent upon implementation of a revised records management program as described in paragraph (2) below.

- c) Construction radiographs formally stored in the construction vault have been transferred to the Iowa Electric corporate offices records vault.
 - d) Completion of lifetime and 5 year record duplication at the plant site will be completed contingent upon implementation of a revised records management program as described in paragraph (2) below.
2. Corrective action to be taken to avoid further noncompliance:
- a) In addition to the specific items discussed above, a review is being conducted to determine the necessary requirements to fully implement the QAD 1317.1, Rev. 1, and incorporate the recommendations of the Corporate Records Management Study recently completed on March 6, 1978. Upon completion of this study, a detailed schedule for full implementation will be determined.
3. Date and full compliance will be achieved:
- a) Administrative Control Procedure 1402.5 will be revised by May 15, 1978.
 - b) Review of the Corporate Records Management Study and implementation of appropriate recommendations will be completed by December 31, 1978.

Very truly yours,


J. A. Wallace
Vice President-Generation

JAW/DLW/ar

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

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: Response letter dated April 28, 1978
to James Keppler from J. A. Wallace
concerning IE Inspection Report 78-05

File: A-102 Inspection Report 78-05

Dear Mr. Keppler:

This letter is intended to clarify our response in the subject letter above and to provide information concerning our efforts to duplicate records at DAEC.

Our response to Inspection Report 78-05 intended to convey that by December 31, 1978 we will complete a review of the Corporate Records Management Study and develop a schedule of implementing the results of the review.

With respect to the duplication of key records at DAEC we have developed the following plan:

- 1) The necessary project approval is being initiated by the Corporate Services Department. Approval is anticipated by June 1, 1978.
- 2) Selection and procurement of the necessary microfilming equipment is anticipated to be completed by September 1, 1978.
- 3) Equipment installation will take approximately 2 weeks and is anticipated to be complete by September 15, 1978.
- 4) All records with the exception of station log books will be duplicated on site at DAEC. It has been decided to do this work on site in order to eliminate loss of records during transit off site and to take advantage of using the DAEC clerical staff for the duplication effort. It is anticipated that this duplication effort will take one (1) year, thus being completed by September 15, 1979.

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The station log books will be duplicated by contract because of the unique configuration of the log book being a bound book.

- 5) During the procurement of the microfilming equipment, plant procedures will be revised to reflect the use and control of the microfilm records.
- 6) One set of records will be maintained at DAEC and one set will be sent for storage in the ie: bank vault.

I hope the above information clarifies our earlier response and provides sufficient information as to our effort on duplication of DAEC documents.

Very truly yours,


J. A. Wallace
Vice President-Generation

JAW/ELH/mg

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