

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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 ACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow      05000331  
 AUTH. NAME      AUTHOR AFFILIATION  
 ROTHERT, W.C.      Iowa Electric Light & Power Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 DAVIS, A.B.      Region 3, Ofc of the Director

SUBJECT: Responds to notice of violation in Insp Rept 50-331/88-04.

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	NRR/DREP/RPB 10	2 2	NRR/PMAS/ILRB12	1 1	D
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Iowa Electric Light and Power Company

April 29, 1988  
NG-88-1490

Mr. A. Bert Davis  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Response to Notice of Violation Transmitted  
with Inspection Report 88-004

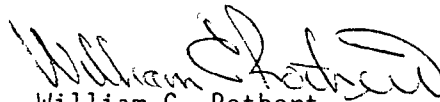
File: A-102, A-103

Dear Mr. Davis:

This letter and attachment are provided in response to the subject Notice of Violation concerning inspections of activities at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact our office.

Very truly yours,

  
William C. Rothert  
Manager, Nuclear Division

WCR/VJC/go

Attachment: Response to Notice of Violation Transmitted  
with Inspection Report 88-004

cc: U. S. NRC Document Control Desk (Original)  
L. Liu  
L. Root  
R. McGaughy  
J. R. Hall (NRR)  
NRC Resident Inspector - DAEC  
V. Crew  
Commitment Control No. 880107

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Iowa Electric Light and Power Company  
Response to Notice of Violation  
Transmitted with Inspection Report 88004

NRC Item of Violation (Severity Level IV)

The Duane Arnold Energy Center Technical Specifications, Section 6.9.1, requires in part, that procedures for personnel radiation protection shall be maintained and adhered to.

A Radiation Protection Department Health Physics Instruction/Procedure - 3100 Manual HPI No. 1.2 ("Radiation Work Permits Preparation and Use," Revision 1, dated October 30, 1987) requires in Paragraph 4.4.2(b), that during work within posted areas, workers shall properly wear protective clothing as directed by Radiation Work Permits (RWP) or Health Physics (HP). Also, Radiation Protection Department Health Physics Procedure - 3100 Manual HPP No. 6.0 ("Personnel Monitoring, Whole Body Counting and Decontamination of Personnel," Revision 2, dated November 17, 1982) required in Paragraph 6.1(a), that all personnel shall perform a whole body frisk upon exiting a contaminated area.

Contrary to the above, on February 11, 1988, two mechanics proceeded to work inside the "E" Condensate Demineralizer without wearing the required hoods per the clothing requirements specified on RWP No. 88-00089. After further discussion, it was also concluded that the mechanics had not been granted a waiver from the RWP requirements by the HP technician on that date. Such waivers are permitted by procedure providing there is continuous HP coverage.

Subsequently, the same maintenance crew on the following day (February 12, 1988) failed to perform a full body frisk after exiting the contaminated area. This item was identified by the licensee and immediate corrective actions were undertaken. This is another example of the violation and is related to the same maintenance crew.

Response to Item of Violation

1. Corrective Actions Taken and Results Achieved:

On February 10, 1988, the HP representative had granted a waiver from the RWP dress requirement of wearing a hood for personnel working inside the Condensate Demineralizer. This waiver was given orally and HP constant surveillance was maintained. However, since the radiological conditions did not change from February 10 to February 11, the workers mistakenly believed that the RWP waiver of the hood requirement was still in effect. The HP representative on February 11 was unaware of the oral waiver and he did not maintain continuous coverage.

The Radiation Protection Department Health Physics Instruction/Procedure - 3100 Manual HPI No. 1.2 ("Radiation Work Permits Preparation and Use") has been modified to require the Health Physics representative to incorporate handwritten revisions into a RWP when the actual requirements of the work are changed from those originally stated. This revision was completed February 23, 1988. Specific training of this new requirement has been completed for Health Physics Department personnel.

All standing RWPs have been reviewed and revised to better meet Radiation Protection requirements for the specific job involved.

We have stressed to employees the requirement for strict RWP compliance via management meetings and via direct contact with the individuals involved. These meetings also stressed the requirement for whole body frisking.

2. Corrective Actions to be Taken:

The procedure revision and training listed above have been completed.

3. Date of Full Compliance:

Full compliance was achieved with management and individual meetings which were completed on February 12, 1988 and procedure revisions completed on February 23, 1988.