

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

April 13, 1979
IE-79-578

LEE LIU
SENIOR VICE PRESIDENT - ENGINEERING

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

Dear Mr. Keppler:

This letter is intended as a response to Mr. Davis' letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on March 7-9, 1979. The following are responses which are required by Mr. Davis' letter:

Infraction

10 CFR 71.3 prohibits a licensee from delivering any licensed material to a carrier for transport, except as authorized in general or specific license issued by the Commission or as exempted in 10 CFR Part 71.

10 CFR 71.12 states that a general license is issued to deliver packages containing greater than Type A quantities of radioactive material to a carrier for transport, provided the licensee has a quality assurance program whose description has been submitted to the Commission as required by 10 CFR 71.51. Part 71.51(a) requires that the quality assurance program description be submitted by January 1, 1979.

Contrary to the above, as of March 9, 1979, the licensee: (1) had not submitted the quality assurance program description as required; and (2) since January 1, 1979, on seven occasions had shipped radioactive waste exceeding Type A quantities in a package without a general or specific license.

Response

1. Corrective action taken and results achieved:

Enclosure 1 is a copy of a letter, dated March 16, 1979, submitted by Iowa Electric Light and Power Company stating our intent to implement a quality assurance program applicable to

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Mr. James Keppler
April 13, 1979
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shipping activities governed by 10 CFR Part 71. Enclosure 2 is a telecopy, dated April 10, 1979, received from Mr. Charles E. MacDonald, Chief, Transportation Branch of the Division of Fuel Cycle and Material Safety, which gives approval for shipping under the condition that the quality assurance program be implemented by June 1, 1979.

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

The quality assurance program will be implemented as stated above.

3. The date when full compliance will be achieved:

June 1, 1979.

Very truly yours,

Harold W. Rehauer for

Lee Liu
Senior Vice President - Engineering

LL/RFS/sh

cc: R. Salmon
D. Arnold
H. Rehauer
R. Lowenstein
R. Clark (NRC)
File: A-102, Q-56, G-11

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

March 16, 1979

IE-79-418

LEE LIU

SENIOR VICE PRESIDENT - ENGINEERING

Mr. Charles E. MacDonald, Chief
Transportation Branch
Division of Fuel Cycle and
Material Safety
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. MacDonald:

This will confirm that, pursuant to 10 CFR 71.51(d), Iowa Electric Light and Power Company will apply the principles of our quality assurance program developed pursuant to 10 CFR Part 50, Appendix B. "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants" to shipping activities governed by 10 CFR Part 71. This operating quality assurance program is described in the Final Safety Analysis Report Appendix D, Section D.7, as revised in March 1977. This program follows the guidance of WASH 1284, 1309 and 1283 per the commitment outlined in Iowa Electric's January 31, 1975 letter from Mr. Duane Arnold to Mr. George Lear. We plan to modify existing directives and procedures, and prepare new procedures as necessary, in order to implement the program's application to shipping activities within 90 days. However, no further shipments of Type B radwaste will be made until we receive approval from the Nuclear Regulatory Commission.

It is essential that we ship Type B packages of radwaste from the Duane Arnold Energy Center site within three weeks because significant personnel radiation exposure would result if it is necessary to place the packages in temporary storage areas. We shall therefore very much appreciate receiving promptly your confirmation that the above commitment is satisfactory.

Very truly yours,



Lee Liu

Senior Vice President-Engineering

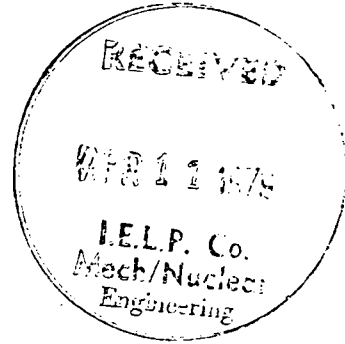
LL/RFS/lw

cc: R. Salmon
D. Arnold
H. Rehrauer
R. Lowenstein
R. Clark (NRC)
File A-102, Q-56, G-11

• Arnold	• Cook	• Walling	• York
• Liu	• Behrauer	• Salmon	• Hannen
• Tutill	• Shearer	• Mineck	• Wilson
• Wallace	• Ellis	• P. Ward	• Young
• Root	• Meyer	• Blase	• Filc(s)
• E. Heinnond	• Nodden	• Pinner	
• Comm. Cont.	• Gucciardo	• Lowenstein	

NRC FORM 311 U.S. NUCLEAR REGULATORY COMMISSION QUALITY ASSURANCE PROGRAM APPROVAL FOR RADIOACTIVE MATERIAL PACKAGES		APPROVAL NUMBER (1234) REVISION NUMBER (1)
Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 5 by the person named in Item 2, the Quality Assurance Program identified in Item 1 is hereby approved. This approval is issued to satisfy the requirements of Section 71.61 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.		
1. NAME Iowa Electric Light & Power Company		2. EXPIRATION DATE June 30, 1984
3. STREET ADDRESS P. O. Box 351 Cedar Rapids		4. CONTACT INFORMATION STATE IA ZIP CODE 52406 72-1256
5. QUALITY ASSURANCE PROGRAM APPLICATION DATE: March 16, 1979		
6. CONDITIONS <p style="text-align: center;">Activities conducted under applicable criteria of Appendix G of 10 CFR Part 50 to be executed with regard to transportation packages by June 1, 1979.</p>		
FOR THE U.S. NUCLEAR REGULATORY COMMISSION SIGNATURE: <i>Charles F. MacGillivray</i> Charles F. MacGillivray, Chief, Transportation Branch Division of Fuel Cycle and Material Safety, 1979		DATE APR 10 1979

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| • Arnold | • Cook | • Walling | • York |
| • Liu | • Rohrauer | • Salmon | • Harren |
| • Tethill | • Chearer | • Mineck | • Wilson |
| • Wallace | • Ellis | • P. Ward | • Young |
| • Root | • Meyer | • Blase | • File(s) |
| • E. Hammond | • Jodean | • Pitner | • Essig |
| Comm. Cont. | • Gucciardo | • Lowenstein | |