

Iowa Electric Light and Power Company

June 4, 1985
NG-85- 2614

Mr. James G. Keppler
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 DPR-49
Response to NRC Inspection Report 85-09

Dear Mr. Keppler:

This letter is provided in response to the subject inspection of Duane Arnold Energy Center activities on April 8-12 and April 17, 1985. Attachment 1 provides our response in accordance with your request. The NRC resident's office was notified of our need to submit this response one day late. We apologize for any inconvenience this may cause.

Very truly yours,



Richard W. McGaughy
Manager, Nuclear Division

RWM/WRK/kp

Attachment: Response to IR 85-09

JUN 7 1985

cc: W. Keith
L. Liu
S. Tuthill
M. Thadani
NRC Resident Inspector
Commitment Control 850143
File A-102, NRC-4

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Response to IR 85-09

Attachment 1

NRC Item of Violation (Severity V)

Duane Arnold Energy Center Environmental Technical Specifications (Appendix B to Facility Operating License), Table 4.3-1 states that:

1. Sample frequency of wildlife is semiannually; and
2. Sample frequency of soil is triannually during the growing season.

Environmental Technical Specifications, Section 4.1.2 (Terrestrial Environmental Surveillance) describes the growing season as May through September.

Contrary to these requirements, both wildlife samples for 1983 were collected in the first half of the year, only one wildlife sample was collected in 1984, and one of the three soil samples for 1983 was collected in October. It is noted that the Iowa Electric QA audit, which was used as a reference during the NRC Inspection, erroneously listed the year of the October soil sample as 1984.

Response to Item of Violation

1. Corrective Action Taken and the Results Achieved

A 1984 internal QA audit noted that the DAEC monitoring program listed a wildlife sample frequency of "Annually". This conflicts with the Technical Specification described above. Despite the inconsistency, an attempt was made to obtain two wildlife samples in 1984. However, two suitable road kills were not available. In accordance with DAEC Environmental Technical Specification 4.3.1.E, this deviation from the required sampling schedule was duly noted in the Environmental Radiological Monitoring Report submitted to the NRC for 1984. The DAEC monitoring program was revised to require semiannual wildlife samples.

DAEC collects wildlife samples through road kills only. Trapping and hunting are not considered to be appropriate collection methods. Road kills must be in an acceptable condition for sampling. This has also limited the number of samples available. Iowa Electric is being more diligent in searching for suitable road kills and the wildlife sample for the first half of 1985 has been collected as required.

Response to Item of Violation (Cont.)

1983 soil samples were collected in accordance with an Iowa Electric Environmental Sampling Procedure which specified that samples should be collected in spring, summer, and fall to meet the Environmental Technical Specifications sampling frequency of "triannually during the growing season". As a result of the 1984 QA audit referenced above, the Environmental Sampling Procedure was revised August 24, 1984 to collect the samples during the period of May through September to be in accord with the definition of "growing season" in the Terrestrial Section of the Environmental Technical Specifications.

Discrepancies between the DAEC monitoring program and the Environmental Technical Specifications were first found in a 1983 Iowa Electric QA Audit. The 1984 audit was performed at the request of DAEC personnel to identify any other discrepancies. These discrepancies were corrected in a November, 1984 revision of the DAEC monitoring program. In order to monitor overall program compliance with Environmental Technical Specifications, additional corrective actions have been taken as follows:

- 1) The monthly log of environmental sampling has been expanded to provide management with more data on sample collection.
 - 2) A radiological engineer has been given responsibility to assure that samples are collected correctly.
2. Corrective Action to be Taken to Avoid Further Noncompliance
- Corrective action has been completed as discussed in Item 1 above.
3. Date When Full Compliance Will be Achieved
- Full compliance was achieved May 15, 1985 upon Licensee's identification and institution of corrective action identified in Item 1 above.