

Iowa Electric Light and Power Company

July 7, 1985

NG-85-3307

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 No: DPR-49
Response to NRC Inspection Report 85-12

Dear Mr. Keppler:

This letter is provided in response to Mr. C. J. Paperiello's letter concerning an inspection of activities at the Duane Arnold Energy Center, conducted on May 6 through May 10, 1985. Attachment 1 provides the subject response in accordance with your request.

Yours very truly,



Richard W. McGaughy
Manager, Nuclear Division

RWM/WJM/gj

Attachment 1. Response to Inspection Report 85-12

cc: W. Miller
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S. Tuthill
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NRC Resident Office
Commitment Control

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RESPONSE TO NOTICE OF VIOLATION

NRC Item 1

1. Technical Specification 6.9.1 states, in part, that procedures for personnel protection shall be prepared, maintained, and adhered to for all operations involving personal radiation exposure. Health Physics Instruction (HPI) 3106.3.1 states, in part, that Standing RWP's are intended for specific work functions of repetitive or routine nature.

Contrary to this requirement, on April 8, 1985, three (3) workers, including a contract (General Electric Company) engineer entered the reactor water cleanup phase separator room under standing radiation work permits applicable only to Operations and Health Physics personnel. In addition, the purpose of the entry was to identify and tag several valves, an operation which is not considered routine or repetitive due to the infrequent entry into this area, which was a Locked High Radiation Area.

This is a Severity Level IV violation (Supplement IV).

Response to Item 1

Corrective Action Taken and Results Achieved

The corrective actions that have occurred to address the entire event are as follows:

- (1) The room in question was promptly secured with an additional lock and the keys placed under the control of Health Physics.
- (2) Addendums to Standing Radiation Work Permits (RWPs) used for entry into High Rad Areas have been completed which state explicitly who is allowed to use the RWP.
- (3) Procedures have been modified requiring a limited duration, Special RWP for entry into areas having potential dose rates in excess of 10 R/hr. This RWP requires the approval of Radiation Protection Supervision.
- (4) Health Physics Technicians, responsible for access control, were trained on the addendums and procedural changes stated above. This training also addressed the fact that Standing RWPs are to be used for routine and repetitive tasks only.
- (5) All plant personnel were notified of the incident and told of the areas having a potential dose rate in excess of 10 R/hr via a newsletter.

Completion of the foregoing actions achieved full compliance.

Corrective Action To Be Taken

The following additional corrective actions will be taken to further strengthen controls in this area:

- (1) A dual lock system, under operations and health physics control, will be instituted for all areas having potential dose rates in excess of 10 R/hr. Procurement of the appropriate locks is in progress and they will be installed promptly upon receipt. Installation is currently anticipated to be completed by September, 1985.
- (2) Studies are being undertaken to determine the feasibility of implementing engineering controls to reduce the number of areas having potential dose rates in excess of 10 R/hr. These studies will be completed by October, 1985.

Date When Full Compliance Will Be Achieved

DAEC is in full compliance as of this response.

NRC Item 2

10 CFR 20.201 (b) requires, in part, each licensee to make surveys that are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to this requirement, on April 8, 1985, a health physics technician allowed two (2) workers to enter a Locked High Radiation Area before he made a survey to determine the degree of radiation hazard in that area.

This is a Severity Level IV violation (Supplement IV).

Corrective Action Taken and Results Achieved

The response to Item 1 addresses the general corrective action initiated in response to this event.

- (1) The RWP addendum changes reemphasize the need for radiological condition determination prior to entry.
- (2) Procedural changes have been made to strengthen the requirement that pre-job surveys be conducted prior to worker entry into a Locked High Radiation Area.
- (3) The health physics technicians have been trained regarding these changes.

Corrective Action To Be Taken

No additional corrective action is planned.

Date When Full Compliance Will Be Achieved

DAEC is in full compliance as of this response.

In addition to the violations, the NRC Inspection Report commented upon two (2) apparent weaknesses in Section 13 of the report. The following actions have been initiated to address these concerns:

- (1) Health Physics training is being modified to emphasize the particular radiological conditions found at the DAEC. This will be done by September, 1985.
- (2) Health physics technicians are required to provide pre-job briefings to workers entering Locked High Radiation Areas. Administrative controls will be instituted, requiring formal notification of the Shift Supervisor of the completion of this briefing prior to checking out a key to a Locked High Radiation Area. These additional controls will be completed by October, 1985.