

Iowa Electric Light and Power Company

October 10, 1985
NG-85-4518

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Duane Arnold Energy Center
Docket No. 50-331
OP. License No: DPR-49
Response to NRC Inspection Report 85-22

File: A-102

Dear Mr. Keppler:

This letter is provided in response to Mr. W. D. Shafer's letter concerning an inspection of activities at the Duane Arnold Energy Center, conducted on August 12 through August 15, 1985. Attachment 1 provides the subject response in accordance with your request.

Very truly yours,

R. W. McGaughy
Richard W. McGaughy
Manager, Nuclear Division

RWM/HG/kmf

Attachment 1. Response to Notice of Violation

cc: H. Giorgio
L. Liu
S. Tuthill
M. Thadani
NRC Resident Office
Commitment Control

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RESPONSE TO NOTICE OF VIOLATION
(Inspection Report 85-22)

NRC Item 1

1. Technical Specification 6.8.1.a. requires that applicable procedures for activities recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, be written, established, implemented and maintained. Section 7.1 of Appendix "A" of Regulatory Guide 1.33, Revision 2, specifies procedures for sampling, monitoring, and discharging effluents from the liquid radioactive waste system. Plant Chemistry Procedures PCP 10.8, Revision 5, March 25, 1985, "Radioactive Liquid Release Analysis and Documentation", in Section 7 has procedures for "discharges not through radwaste". Among the requirements for such a release are completion of the Radioactive Liquid Batch Release Record (Step 7.9) and completion of Radioactive Liquid Release Authorization II (Step 7.10).

Contrary to the above, about a million gallons of water from circulating water system which inadvertently received about 8,000 gallons of slightly contaminated water from the condenser hotwell on May 30, 1985, was subsequently released to the river via the circulating water blowdown line without completion of the required radioactive liquid batch release record and the radioactive liquid release authorization form.

This is a Severity Level V violation (Supplement I).

Response to Item 1

Corrective Action Taken and Results Achieved

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

- (1) Analysis of samples taken during the event were utilized to estimate the total radioactivity released to the river. This information was conveyed to the NRC in the form of an addendum to the Semi-Annual Effluent Report for the first half of 1985.
- (2) Because the incident resulted from a misinterpretation of Paragraph 5 of the note to 10 CFR 20 Appendix B, management, supervision and the radiological engineers in the Radiation Protection Group were made aware of the

correct interpretation of the note, (i.e., that a radio-nuclide may be considered as not present in a mixture only if there are other radioisotopes present and accounted for in the mixture). They were told the footnote can not be used to establish a deminis level for releases of liquids.

- (3) Data was retrieved and the Radioactive Liquid Batch Release Record and Radioactive Liquid Release Authorization forms were completed to the extent feasible.

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.