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 MINECK, D.L. Iowa Electric Light & Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 DAVIS, A.B. Region 3, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-331/89-22.

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Iowa Electric Light and Power Company

December 13, 1989

NG-89-3663

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 89022

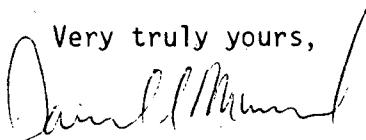
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Dear Mr. Davis:

This letter and attachment are provided in response to the Notice of Violation concerning certain 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,



Daniel L. Mineck
Manager, Nuclear Division

DLM/RMM/gt

Attachment: Response to Notice of Violation
Transmitted with Inspection Report 89-022

cc: U. S. NRC Document Control Desk (Original)
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRR)
NRC Resident Inspector - DAEC
R. McGee
Commitment Control No. 890420

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Iowa Electric Light and Power Company
Response to Notice of Violation
Transmitted with Inspection Report 89-022

NRC NOTICE OF VIOLATION

Technical Specification (TS) 6.8.3 requires that changes to certain procedures, including surveillance procedures, shall be reviewed by the Operations Committee prior to implementation. TS 6.8.3 allows for temporary minor changes which do not change the intent of the original procedure, to be made with the concurrence of two members of the plant management staff and promptly reviewed by the Operations Committee and by the Plant Superintendent - Nuclear.

Duane Arnold Energy Center Administrative Procedure 1406.3 requires temporary procedure revisions be evaluated for 10 CFR 50.59 applicability, concurred on by two members of plant management staff, and be reviewed by the Operations Committee.

Contrary to the above, on October 11, 1989, while performing Surveillance Test Procedure (STP) 47C001, the licensee made changes to the performance of the procedure without concurrence of two members of the plant management staff or subsequent review by the Operations Committee.

This is a Severity Level IV Violation.

RESPONSE TO NOTICE OF VIOLATION

1. Corrective Actions Taken and the Results Achieved:

Plant management has given written direction to strengthen the policy of strict procedural compliance and re-emphasized what actions are required for procedural changes or deviations.

Surveillance Test Procedure (STP) 47C001 previously contained inconsistencies for flow requirements of the Standby Gas Treatment System. Revision 2 to STP 47C001 eliminated these inconsistencies. The revision received required concurrence of two members of management staff and Operations Committee review and was implemented on November 10, 1989.

2. Corrective Actions to be Taken to Prevent Recurrence

The inspection report expressed concern over performance of Secondary Containment testing in other than calm wind conditions. Subsequent tests performed under calm wind conditions yielded similar satisfactory results. Licensee Event Report 89-012 corrective action developed a Secondary Containment performance trending program. Data collected under the trending program will be utilized to determine the effect of wind on Secondary Containment testing. Adequate data will be available for the determination to be made by December 14, 1990.

3. Date When Full Compliance Will be Achieved

Full compliance was achieved with review of STP 47C001 revisions and issuance of Plant Superintendent re-emphasis of the policy letter on December 8, 1989.