



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

August 20, 1982

IE HQ FILE COPY

Docket No. 50-331

Iowa Electric Light and Power  
Company  
ATTN: Mr. Duane Arnold, Chairman  
of the Board and Chief  
Executive Officer  
IE Towers  
P. O. Box 351  
Cedar Rapids, IA 52406

Gentlemen:

We have reviewed your draft Regulatory Performance Improvement Program submitted to us by your letter of July 30, 1982. Our comments are as follows:

1. The plan appears to respond only to problem areas identified by NRC Region III and does not reflect consideration of any problem areas which may have been identified by internal Iowa Electric assessments, INPO evaluations, and consultant reviews.
2. Section I of your plan does not address communications within the corporate office.
3. Section I.4 of your plan should be expanded to provide more details such as what specifically will be on the formal commitment control list, what procedural controls will govern its use, who will assure resources are committed to address the items on the list, what mechanisms will be in place to assure commitments are followed up on, etc.
4. Section I.3 of your plan on page 6 should be expanded to provide more details as to what facility changes are contemplated, when they are proposed for completion, and what improvements in communications are anticipated.

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5. Section II.B.1 of your plan on page 8 discusses quarterly briefings of senior management. We believe quarterly is too long an interval and the number of subjects specified is excessive for a briefing. We also believe that daily meetings of station personnel to discuss work activities and impact on the various departments of those work activities, and monthly reports by station department heads to corporate management should be considered as mechanisms to improve the management overview function.
6. Section II.B of your plan states that removal of administrative burdens will enhance management and supervisory involvement. We believe more specific details are needed as to how this will be accomplished.
7. Section II.B.2.D of your plan on page 15 addresses the use of "loaned" contractor employees. We believe your plan should address if and when the responsibilities and experience will be transferred to DAEC personnel.
8. Section III.B.2.D of your plan on page 16 has a key milestone date of May 1983 for a final "work breakdown analysis." It does not appear that this date is supported by your 1983 staffing plan.
9. Section III of your plan does not discuss prioritizing the review of procedures. We believe your plan should address this prioritization.
10. Section IV.B of your plan on page 21 addresses the inclusion of the Plant Superintendent - Nuclear and Manager of Quality Assurance in the Safety Committee, and the assignment of audits performed under the cognizance of the Safety Committee to the Quality Assurance Department. We agree with these concepts but we are concerned about the potential adverse impact of the additional administrative burdens on these two individuals, and of the additional audit responsibilities on the Quality Assurance staff.
11. Section IV of your plan does not address prioritization of Safety Committee open items so that items with a need for timely resolution can be addressed in an expeditious manner. We believe your plan should address this prioritization.
12. Section VI.B of your plan on page 25 discusses identifying root causes and generic implications. We believe your plan should provide more information related to the mechanism used to determine the root causes of LERs.

Iowa Electric Light and  
Power Company

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It is our understanding that Mr. Lee Liu and others of your staff will be prepared to present your views on our comments during the meeting to be held in our office at 10:00 a.m. on September 13, 1982, to discuss your final Regulatory Performance Improvement Program.

Sincerely,

Original signed by  
A. Bert Davis

James G. Keppler  
Regional Administrator

cc: D. Mineck, Chief Engineer  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Thomas Houvenagle, Iowa  
Commerce Commission

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