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Iowa Electric Light and Power Company

August 19, 1983

DAEC-83-679

Mr. Harold Denton, Director
Office of Nuclear Regulatory Regulation
U. S. Nuclear Regulatory Commission
1717 H. Street N.W.
Washington, D. C. 20555

Subject: Duane Arnold Energy Center
Docket No. 50-331
Op. License No. DPR-49
Environmental Technical Specification
(ETS) Violation ETSV 83-02

Dear Mr. Denton:

This report is submitted in accordance with the requirements of the DAEC Environmental Technical Specifications (ETS) Appendix B, Section 5.4.2.1.

Problem

On August 10, 1983 it was discovered during an internal quality assurance audit that ground water analysis for Sr-89 and Sr-90 has not been performed since 1980 as required by ETS Table 4.3-1. Notifications, in accordance with ETS 5.4.2.1 to the NRC and ETS 5.2.A for Iowa Electric management were promptly initiated. A complete evaluation of the Environmental Radiation Monitoring Program was also promptly initiated. This resulted in the identification of a second problem on August 11, 1983. Specifically, surface water samples have been composited and analyzed for gross beta on a quarterly basis rather than on a monthly basis.

There was no safety implications due to the violations. Although no quarterly analysis for Sr-89 and Sr-90 was performed on ground water samples, monthly analysis for gross beta was performed. These values ranged from 0.7 to 8.8 pCi/l. Such concentrations are within the normal range for background gross beta in ground water samples. Even assuming Sr-89 or Sr-90 accounts for 100% of the beta activity, the maximum concentration would have been a factor of 340, and 34 below the respective MPC_w's found in Appendix B of 10 CFR 20, and below the concentrations allowed in Iowa drinking water.

Though no monthly analysis for gross beta was performed on surface water samples, quarterly composites were obtained and analyzed. These values, (1.8 to 8.4 pCi/l) were also within the normal ranges. These values are also well below the average annual concentration of 50 pCi/l allowed in Iowa drinking water.

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Although omission of these analyses was a violation of DAEC Appendix B Technical Specifications, we note that the sampling performed would have been in accordance with the NRC's Model RETS of NUREG 0473, for ground water and surface water. In addition, proposed technical specification amendment RTS-115 which has been extensively discussed with the NRC does not include these specific analyses.

Investigation

The cause of the violations was the inadequate review of the operational Environmental Program Study Plan submitted by Hazelton Environmental Sciences (now Teledyne Isotopes) in September, 1979. Teledyne Isotopes assumed the duties of the former contractor. This laboratory started analyzing samples in January, 1980, in accordance with their study plan. However, the plan did not meet the DAEC ETS. Prior to January, 1980, the Environmental Radiation Monitoring Program was performed in full compliance with the Environmental Technical Specifications. Analytical results were reviewed for samples obtained prior to 1980. Our records indicate no prior problem with significant levels of contamination in surface or ground water.

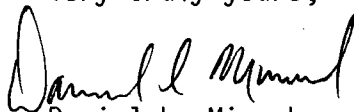
Corrective Action

Teledyne Isotopes has been directed to retrieve all 1983 ground and surface water samples, and reanalyze them in full compliance with the ETS for missed surface and ground water analysis. This will be accomplished by August 31, 1983. Our 1983 Sampling Program will be in complete compliance with the ETS at that time. If the analysis results show significant contamination levels the NRC will be promptly notified.

Also, the Study Plan has been thoroughly reviewed and cross-checked against the ETS. No further items have been identified which are not in compliance with the ETS. Appropriate revisions to the Study Plan will be implemented to ensure full compliance in the future.

This report has been reviewed by the DAEC Operations Committee and the Safety Committee.

Very truly yours,



Daniel L. Mineck
Plant Superintendent - Nuclear
Duane Arnold Energy Center

DLM/MWA/pf*

cc: Mr. James G. Keppler
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U. S. Nuclear Regulatory Commission
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