

Iowa Electric Light and Power Company

May 21, 1981
LDR-81-187

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 81-05

File: A-102, NRC-4, Inspection Report 81-05

Dear Mr. Keppler:

This letter is in response to Mr. R. F. Heishman's letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on March 1 - 31, 1981. The following response indicates the actions which have been taken to correct the item of noncompliance noted in the subject report.

Item of Noncompliance

10 CFR 50.72, Notification of Significant Events, states in part:

"(a) Each licensee of a nuclear power reactor licensed under 10 CFR 50.21 or 50.22 shall notify the NRC Operations Center as soon as possible and in all cases within one hour by telephone of the occurrence of any of the following significant events...

(8) Any accidental, unplanned, or uncontrolled radioactive release."

Contrary to the above, on March 16, 1981 two off gas loop seals overpressurized and released airborne contamination, which was subsequently released through the off gas stack. Total particulate and iodine released when averaged over the calendar quarter was 41% of the DAEC technical specification 8% limit. Gaseous release was .6079% of the 4% DAEC technical specification limit for the day. The maximum release for the day from all points was 430.6 $\mu\text{C}/\text{sec}$. The licensee failed to notify the NRC Operations Center within the one hour required for an accidental unplanned release.

Licensee Comment

As indicated in the subject Inspection Report, due to the low levels of activity involved, the March 16, 1981 event involving overpressurization of the off gas system loop seals and subsequent release of airborne contamination to the environment through the off gas stack was not considered to be significant.

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None of the DAEC Environmental Technical Specification Appendix B radiological limits for maximum allowable gaseous release rates (Section 2.3.1.c) were exceeded, as noted in the subject report. DAEC has a written operating procedure in place for a loss of loop seals and therefore the March 16, 1981 event was not considered an "unplanned radioactive release". Consequently the March 16, 1981 off gas system loop seal event was not reported to the NRC Operations Center within one hour as would be required for "any accidental, unplanned, or uncontrolled radioactive release".

Further it should be noted that although the NRC Operations Center was not notified of this event, the NRC Resident Inspectors at DAEC were on-site and were aware of the details of the off gas loop seal event.

Response

1. Corrective action taken and the results achieved:

Since the NRC has advised DAEC that the March 16, 1981 event was a "significant event", and as such should have been promptly reported to the NRC Operations Center within one hour by telephone in accordance with 10 CFR 50.72, all future similar events involving overpressurized off gas system loop seals will be reported to the NRC Operations Center.

Further, in order to preclude problems of interpretation with prompt notification of significant events, all events will be more closely scrutinized by the DAEC plant management and operations department personnel with respect to reportability. Any event which may be deemed "significant" by these DAEC plant personnel will be promptly reported to the NRC. While this new policy is expected to result in many more DAEC telephone notifications to the NRC Operations Center than in the past, the type of NRC reporting violation described in this report should be eliminated.

2. Corrective actions which will be taken:

See Item 1 above.

3. Date when full compliance will be achieved:

DAEC is presently in full compliance regarding the specific Item of Noncompliance noted. The DAEC prompt reporting requirement for off gas system loop seal overpressurization events was documented by entry in the DAEC Shift Supervising Engineer Instruction Log and began March 18, 1981. As indicated in Item 1 above all DAEC events will be more closely scrutinized by plant personnel in the future in an attempt to eliminate problems of interpretation of which events are "significant events" and consequently require prompt telephone notifications to the NRC Operations Center.

This response is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

By: Larry D. Root
Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/DWT/pl

Subscribed and sworn to before me this 21st day of May, 1981.

Kathleen M. Herber
Notary Public in and for the State of Iowa

cc: Director, Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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