



UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
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OCT 22 1974

Iowa Electric Light and Power Company
ATTN: Mr. Charles W. Sandford
Executive Vice President
Security Building
P.O. Box 351
Cedar Rapids, Iowa 52405

Docket No. 50-331

Gentlemen:

Thank you for your letter dated September 30, 1974, informing us of the steps you have taken to correct the violation which we brought to your attention in our letter dated September 9, 1974. We will examine this matter during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

James G. Keppler
Regional Director

bcc w/ltr dtd : 10/30/74
RO Chief, FS&EB
RO:HQ (4)
Licensing (4)
DR Central Files
RO Files
PDR
Local PDR
NSIC
TIC
OGC, Beth, P-506A
GC (2)

LB

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

CHARLES W. SANDFORD
EXECUTIVE VICE PRESIDENT

DUANE ARNOLD ENERGY CENTER
PALO, IOWA
September 30, 1974
DAEC 74 - 3338

Mr. James G. Keppler, Director
Regulatory Operations Regional Office
U. S. Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

SUBJECT: Unplanned and unmonitored release of water

REFERENCE: RO Inspection Report No. 050-331/74-14
dated 9/9/74
Abnormal Occurrence Report No. 50-331/74-25
dated 8/10/74

FILE: A-110, Q-72b

Dear Mr. Keppler:

In response to your letter accompanying the subject inspection report, this report is being sent concerning corrective actions taken after an unplanned release of water to the river on July 31, 1974. The apparent cause of the occurrence was the disregarding of the instructions on Warning Tags prohibiting operation of the pumps in the automatic mode without specific authorization (including necessary surveillance and monitoring requirements) of the DAEC chemistry group.

Immediate corrective action on August 2, 1974 consisted of locking closed the discharge valves of the two Normal Waste sump pumps and the two Turbine Building Waste sump pumps and placing the key under the control of the Shift Supervising Engineer. The breakers for these pumps were also turned to the "off" position and tagged. The sump pumps were not to be operated until a review of the systems was completed and the system was capable of being operated in a manner consistent with the commitments defined in the FSAR and Technical Specifications. In addition, the Turbine Building floor drains feeding the Normal Waste Sumps were plugged and the Normal Waste discharge was temporarily routed to the Turbine Building Radwaste sump system.

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A brief description of the Turbine Building Sump Systems prior to the subject occurrence is given here in order to better understand the changes made. The Normal Waste sump is connected to the Normal drain which is discharged to the river. Discharge lines coming into the Normal Waste sump are the general floor area drain from the south end of the Turbine Building, the line from the Neutralizing Tank and the tank's vent line. Discharge lines coming into the Chemical Waste sump are from the Make-up Demineralizer floor drain (low curb area), back wash line from the Make-up Demineralizer, floor drain from the Neutralizing tank (high curb area), flush line from Acid and Caustic tanks (by way of Neutralizing tank) and the Acid and Caustic tank sump (by way of Neutralizing tank-high curb area). In addition the Normal Waste and Chemical Waste sumps are connected by a cross-connection with a shear valve near the bottoms of the sumps. Neither sump was sealed to prevent water from leaking into the sump.

The design changes made to preclude a reoccurrence of the incident are as follows:

- 1) The cross-connection between the Chemical Waste Sump and the Normal Waste sump has been eliminated by filling the cross-connection with grout. (This work has been completed.)
- 2) The Chemical Waste sump manhole cover has been fastened by lock-wires and all cover edges sealed to prevent leakage into the sump in the event of flooding in the basement. (This work has been completed.)
- 3) The Normal Waste sump has been isolated from the Normal Waste drain system by rerouting the piping so that the sump pumps into the Turbine Building Radwaste sump system. (The permanent installation is expected to be complete by December 1, 1974.)
- 4) The Chemical sump pumps have been connected to the Normal Waste drains by addition of necessary piping and valves. (This work has been completed using some temporary pipe fittings. Delivery and installation of the permanent fittings is expected to be completed by November 1, 1974.)
- 5) The drain line from the Neutralizing tank to the Normal Waste sump has been capped. It now drains only to the Chemical Waste sump. (This work has been completed.)
- 6) A lock has been installed on the discharge transfer valves used to transfer waste from the Chemical Waste sump to the Normal drain system and the breakers on

the pumps turned off. The key for this lock is under the control of the Shift Supervising Engineer who will call the Radiation-Chemistry Group for sampling for solids and pH before release to the Normal drain system. This is now covered by a written procedure. (This work has been completed.)

- 7) A lock has been installed on the Oily Waste sump pump to prevent pumping into the Normal Waste System. This will remain permanently locked and the sump will be emptied by use of barrels. This is now covered by a written procedure. (This sump was not involved in the subject occurrence, but does have the potential of a similar occurrence so this precaution has been taken.)

In summary, it is now physically impossible to release any effluent containing radioactivity to the river by way of the Normal Waste Sump. Chemical waste can be discharged to the river, but only after it has been properly sampled by the Radiation Chemistry group and permission given by the Shift Supervisory Engineer to close the sump pump breakers and unlock the discharge transfer line sumps from the Chemical Waste sump to the Normal drain system. Discharges from the Oily Waste Sump are accomplished as described above. Operations personnel have been cautioned to adhere to all Administrative Control Procedures including warning tags.

The above design changes were reviewed and approved by the Operations Committee which found that the changes did not constitute an unreviewed safety question.

Very truly yours,

Charles W. Sandford
Charles W. Sandford
Executive Vice President

CWS:D

cc: J. Wallace
G. Hunt
E. Hammond
L. Root
H. Rehrauer
G. Cook
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