



UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

September 26, 1972

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

Docket No. 50-331

Gentlemen:

Thank you for your letter dated September 20, 1972, informing us of the steps you have taken to correct the item of apparent noncompliance and nonconformance which we brought to your attention in our letter dated August 17, 1972. We will examine this matter during our next inspection.

Your cooperation with us is appreciated.

Sincerely yours,

Boyce H. Grier
Regional Director

cc: L. D. Root, Assistant
Project Manager
H. A. Herold
Project Engineer
G. A. Cook, Quality
Assurance Manager
R. D. Essig, Quality
Assurance Engineer

bcc w/ltr dtd 9-20-72:

J. B. Henderson, RO
J. G. Keppler, RO
H. D. Thornburg, RO
R. H. Engelken, RO
G. W. Reinmuth, RO
P. A. Morris, RO
A. Giambusso, L
DR Central Files
RO Files
PDR
Local PDR
NSIC
DTIE

Misc.

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

C. W. SANDFORD
VICE PRESIDENT

September 20, 1972

Mr. Boyce H. Grier
Regional Director
Atomic Energy Commission
Directorate of Regulatory Operations
Region 111, 799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Grier:

In response to the apparent nonconformance found during your inspection of August 8 - 10, 1972 and pointed out in your letter of August 17, 1972, we offer the following comments.

At the time of the improper use of carbon rod in stainless steel weld A-9, the judgment of the responsible site personnel was to repair the defect as a normal in-process weld repair, as provided for in the procedures covering nonconforming material. The field welding engineer obtained the verbal concurrence of NSSS supplier who had supplied the material involved. The revision of the procedure for processing of nonconforming items, in effect at the time, did not require that an NCR be used for in-process repairs. The repair was not considered "extensive" as defined by weld inspection procedure W-1 to require the application of an NCR.

In retrospect, we agree an NCR should have been implemented at the time of the occurrence. Since the occurrence, the procedure covering the processing of nonconforming items has been revised and is now in effect. This revision redefined the term "nonconformance," thereby improving the clarity and reducing the possibility of similar future misunderstandings.

The apparent commencement of repair work without a specific written procedure was the result of the decision, discussed above, to proceed with the work as an in-process repair. We agree a written in-

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Mr. Boyce H. Grier

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struction should have been prepared to cover the removal work prior to the start of the grinding operation. The redefining of what constitutes a nonconformance, as discussed above, should preclude the possibility of reoccurrence. Further indoctrination of field personnel has also taken place.

We appreciate the opportunity afforded us to comment on this matter.

Very truly yours,


C. W. Sandford
Vice President

CWS:bw

cc: Larry Root
Gordon Cook
Gordon Parkinson
Chet Darrow
Jack Newman