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 DAVIS, A.B.                      Region 3, Ofc of the Director

SUBJECT: Provides written response to SALP 8 board rept for plant.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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R I D S / A D S / A D S

Iowa Electric Light and Power Company

April 25, 1990

NG-90-1006

Mr. A. Bert Davis  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center  
Docket No.: 50-331  
Op. License No: DPR-49  
Response to SALP 8 Board Report for the DAEC  
Reference: A. Bert Davis to L. Liu, dated March 7, 1990.  
File: A-102, A-103

Dear Mr. Davis:

We appreciated our meeting with members of your staff on March 29, 1990 to discuss the report prepared under the Systematic Assessment of Licensee Performance (SALP) program for the Duane Arnold Energy Center, which was transmitted by your referenced letter. This letter provides our written response to the SALP report and your letter.

We are pleased with the recognition of our improvements in Operations and Emergency Planning. We intend to continue our good performance and make further improvements in these areas. We are confident that our performance in Emergency Planning will rate a Category 1 rating in the next SALP report.

We recognize that we must focus special attention on the areas which were identified in your letter and the SALP report as having identified weaknesses in performance. Specifically, we recognize that more management attention is needed to reduce the number of personnel errors which occur during maintenance and surveillance activities, to become more aggressive in our implementation of corrective actions to identified deficiencies, to improve our environmental qualification program, including training of those personnel involved in implementing our Environmental Qualification Program, and to improve our training of security personnel.

In January of this year we began the process of developing a long-range strategic plan. The purpose of this strategic plan is to chart our course over the next few years to meet the challenges ahead of us in remaining a strong and viable performer in nuclear utility business. The plan will provide the structure by which we identify our long-term goals, identify actions needed to be taken to reach those goals, and provide a mechanism for us to monitor our progress in achieving our stated goals.

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One of the initial activities in the development of this plan was to critique our current operation to identify significant strengths and weaknesses. Many of the weaknesses identified in the SALP report were also identified in our self-examination process. Consequently, the plan will serve as our mechanism to improve in many of the areas of weakness noted in the SALP report. We are in the process of finalizing the strategic plan and look forward to sharing it with you during our routine management meetings.

In addition to the improvements being made via the strategic plan noted above, several noteworthy activities have been completed or are currently underway to strengthen specific areas identified as weaknesses in the SALP report.

We have taken actions to improve our ability to attract and retain qualified Radiation Protection personnel.

We recognize the strong relationship between the clarity of plant procedures and personnel errors in the performance of tasks governed by these procedures. Consequently, we are reviewing our maintenance and surveillance testing procedures and revising them to make the procedures more "user friendly." In order to strengthen the feedback and communication channels between the surveillance personnel and the procedure writers during this procedure review and in the future development of procedures and procedure revisions, the procedure writers observe the surveillance personnel during the performance of the surveillance tests. The procedure writers and surveillance personnel then work together to identify ways to improve the procedure.

We will devote additional staff to support security training, planning and execution of security contingency drills and implementation of our Fitness-for-Duty program.

We are making several programmatic changes to improve our control of work in high radiation areas. The ALARA function has been consolidated under one supervisor and is now an integral part of the job planning process for work in high radiation areas. ALARA job history files are being improved by consolidating the information regarding both DAEC-specific and industry experiences and lessons-learned from problems encountered during previous, similar work in high radiation areas. These files will be used by the ALARA group in their job planning activities. Additional alarming dosimetry is being procured and its use will be mandatory in designated areas of the plant, beyond those limited areas where it is now presently required.

In the area of Environmental Qualification (EQ), training sessions have begun for those professional and Iowa Electric field (craft) personnel involved in implementing our EQ program, which covered not only the basics of our EQ program, but also the "lessons-learned" from our recent EQ problems. The importance of EQ compliance has been stressed to these plant personnel and has been included in General Employee Training for in-coming personnel, both Iowa Electric and Contractors.

In addition we are making steady progress toward completion of the corrective actions resulting from our root cause evaluation of the earlier problems in our EQ program.

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We have not attempted in this letter to address all of the weaknesses identified in the SALP report. Other improvement initiatives are being developed as part of the strategic plan discussed above, and in related reviews. We plan to keep you informed of our plans, schedules and progress for those items as part of our routine management meetings. We are confident that this process will be instrumental in our achieving improved performance at the DAEC.

Very truly yours,



Daniel L. Mineck  
Manager, Nuclear Division

DLM/RAB/PJV+

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