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

SUBJECT: Responds to 900606 ltr re Rev 9 of Chapter 17.2, "QA During Operations..." of USAR for plant. QA manual Table 2-1 encl.

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Iowa Electric Light and Power Company

July 13, 1990
NG-90-1733

RICHARD W. McGAUGHY
VICE PRESIDENT, PRODUCTION

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
UFSAR Chapter 17.2

- Reference: (1) Letter from H. Miller (NRC) to
L. Liu (Iowa Electric)
dated June 6, 1990
- (2) Letter from R. McGaughy (Iowa
Electric) to A. Bert Davis (NRC)
dated May 23, 1990 (NG-90-1206)
- (3) Letter from R. McGaughy (Iowa
Electric) to Dr. Thomas E. Murley
(NRC) dated June 27, 1990 (NG-90-1472)

File: A-116, A-365, Q-98

Dear Mr. Davis:

This letter is Iowa Electric's response to the Reference 1 letter concerning Revision 9 of Chapter 17.2, "Quality Assurance During the Operations Phase," of the Updated Final Safety Analysis Report (UFSAR) for the Duane Arnold Energy Center (DAEC). Chapter 17.2 is henceforth referred to as the Quality Assurance Program Description (QAPD).

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The Reference 1 letter indicated that the NRC Staff had concluded that certain aspects of QAPD Revision 9 constitute reductions in commitment previously made by Iowa Electric. We do not share this conclusion. However, we believe that the understandings reached at the June 27, 1990 meeting between K. Peveler and R. Browning of Iowa Electric and M. Phillips and F. Maura of your staff make further discussion of our differences on this point unnecessary. We understand that the NRC will complete its evaluation of the Revision 9 QAPD, and a subsequent Revision 10 (submitted by Reference 3), after receipt of this letter.

As was discussed at the June 27 meeting, we recognize that there are questions concerning Iowa Electric's commitments to NRC Regulatory Guides and ANSI standards pertinent to quality assurance. We have undertaken to resolve those questions.

The QAPD states correctly that Regulatory Guide 1.33 (which endorses ANSI N18.7-1976) is the basis of the Iowa Electric Quality Assurance Program. Regulatory Guide 1.33 has been used extensively in the development and implementation of the Quality Assurance Program. However, the commitment to Regulatory Guide 1.33 set out in Chapter 2, Table 2-1, of the Quality Assurance Manual identifies the exceptions which we have taken to ANSI N18.7-1976. We have recently modified the list of exceptions to reflect the change, reported in Revision 9 of the QAPD, in the control of DAEC permanently installed plant instrumentation. A computer-based preventive maintenance program is now used instead of stickers, as described in the Reference 2 letter.

The Reference 1 letter also referred to the fact that the Quality Assurance Manual takes exception to ANSI N18.7-1976 with respect to the "frequency of the independent reviews of the quality assurance audits and the reviews by the Safety Committee of proposed changes to the facility (50.59 changes)." Attachment 1 to this letter addresses this matter.

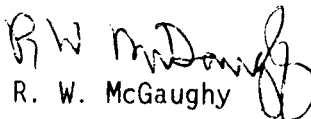
Your staff also expressed concern because the QAPD does not set out specific commitments to certain Regulatory Guides. As we advised your staff, these Guides were used by Iowa Electric in developing the Quality Assurance Program for the DAEC. The commitments, and exceptions taken, to the Regulatory Guides appear in the Quality Assurance Manual, a controlled copy of which has been provided to the NRC since 1983 when the QAPD was first submitted. We include as Attachment 2 to this letter a copy of Table 2-1 from Chapter 2 of the Quality Assurance Manual. This table is a listing of the current commitments to Regulatory Guides, except for Regulatory Guides 1.26 and 1.29. The Iowa Electric position on these may be found in the UFSAR, Sections 1.8.26 and 1.8.29 respectively.

We will update the description of our commitments and any necessary exceptions to the Regulatory Guides and incorporate this information into the QAPD. The Table 2-1 commitments, as supplemented by Attachment 1, will be revised into a form suitable for inclusion in the QAPD. We expect that this next revision of the QAPD will be submitted by October 31, 1990. In the meantime, we will continue to implement the Iowa Electric Quality Assurance Program as presently set out in the QAPD and the Quality Assurance Manual.

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Should you have any further questions or concerns, please contact this office.

Very truly yours,


R. W. McGaughy

RWM/KEP/11

- Attachments: 1) Reviews of Quality Assurance Audits and Reviews
of Changes to the Facility
- 2) Table 2-1 of the Quality Assurance Manual,
Chapter 2, Rev. 8, June 29, 1990

cc: K. Peveler
L. Liu
D. Mineck
L. Root
Document Control Desk (Original)
J. R. Hall (NRC-NRR)
NRC Resident Office
Commitment Control Nos. 900163, 900173

Iowa Electric Light and Power Company

Attachment 1 to July 13, 1990 letter NG-90-1733

Reviews of Quality Assurance Audits and Reviews
of Changes to the Facility

1. Frequency of Independent Reviews of Quality Assurance Audits

Regulatory Guide 1.33, Revision 2, February 1978, endorses ANSI N18.7-1976/ANS-3.2. ANSI-N18.7 Section 4.5, Audit Program, states, "Periodic review of the audit program shall be performed by the independent review body or by a management representative at least semiannually to assure that audits are being accomplished in accordance with the requirements of technical specifications and of this Standard." The Quality Assurance Manual records a formal exception to this position in Chapter 2, Table 2-1, item 3: "Paragraph 4.5 of ANSI N18.7-1976; an annual review shall be specified rather than the stated semiannual review."

The periodic review of the audit program specified in N18.7, Section 4.5, is performed by the Corporate Quality Assurance Manager and the Safety Committee (which is the "independent review body" for IE's QA program). Annually, the Quality Assurance Manager prepares the audit schedule for the following year, including the audits required by the Standard and the Technical Specifications. The Safety Committee also reviews this schedule to ensure that audits required by the technical specifications have been scheduled. In addition, the Safety Committee reviews and approves the audit plan and checklist for any audit required by the technical specifications before the audit begins.

Additional review of the audit program is accomplished through review of reports on individual audits. ANSI-N18.7, Section 4.5 states that "written reports of such audits shall be reviewed by the independent review body and by appropriate members of management including those having responsibility in the area audited." Every audit report is reviewed and approved by the Quality Assurance Manager and, for any Technical Specification required audit, the additional review and approval of the Chairman of the Safety Committee is obtained prior to the report's being issued. Copies of every audit report are sent to the Safety Committee and to the appropriate managers having responsibilities in the areas audited. The Safety Committee reviews each audit report and the responses which are prepared for each audit finding.

We believe that the reviews outlined above provide abundant assurance that audits are being accomplished in accordance with the requirements of the Technical Specifications and of ANSI N18.7. Upon reflection we have concluded that the exception stated in Table 2-1, item 3, and quoted above is not necessary since IE's present practice satisfies the periodic review requirement stated in the standard. Therefore, the exception will be deleted and that change will be reflected in the next revision of the QAPD to be submitted by October 31, 1990.

2. Safety Committee Reviews of Changes to the Facility

ANSI N18.7-1976, Section 4.3.4, Subjects Requiring Independent Review, Par. (1), states that the "independent review body" (Safety Committee) shall review written safety evaluations of changes in the facility, changes in procedures, and tests or experiments, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). The purpose of this review is to verify that such changes, tests or experiments did not involve 1) a change in the technical specifications or 2) an unreviewed safety question.

The Safety Committee reviews the safety evaluations prepared for changes to procedures and for tests and experiments which are completed under 10 CFR 50.59. However, the Safety Committee is not required to review safety evaluations covering changes in the facility completed under 10 CFR 50.59. This departure from Section 4.3.4 of the ANSI standard is reflected in Technical Specification 6.5.2.7.a, which was approved February 11, 1977 by Amendment 27 to the DAEC operating license. The Staff's Safety Evaluation accompanying this amendment noted that, although this review function is usually performed by the Safety Committee, in the case of Iowa Electric, "all design changes are developed and approved within the Engineering organization which does not have direct responsibility for plant operations. The Safety Committee's involvement in design changes has been included in its audit function."

Thus, under DAEC Technical Specification 6.5.2.7, The Safety Committee reviews the safety evaluations for changes to procedures and tests or experiments completed under 10 CFR 50.59 (6.5.2.7.a). However, the safety evaluations of changes in the facility are audited by the Safety Committee as specified in Technical Specification 6.5.2.8.h.

Proposed changes to procedures, proposed changes in the facility, and proposed tests or experiments - any of which involve an unreviewed safety question - are reviewed by the Safety Committee as specified in Technical Specifications 6.5.2.7.b and c. It is the onsite review committee (Operations Committee) which renders determinations in writing with regard to whether or not any proposed change in the facility, test or experiment, or change in procedures, constitutes an unreviewed safety question, as required by Technical Specification 6.5.1.7.b. If an unreviewed safety question is found, the matter is referred to the Safety Committee. All proposed changes in Technical Specifications are reviewed by the Safety Committee. (See Technical Specification 6.5.2.7.d).

Item 3, Operations Quality Assurance, of Table 2-1, Chapter 2 of the Quality Assurance Manual, is intended to identify the exception to Section 4.3.4 of ANSI N18.7-1976 described above. We now realize that it does so inaccurately in that it refers to subparagraph (2) rather than (1) and uses the word "proposed." The table will be revised to state the exception as follows: "Paragraph 4.3.4.(1) of ANSI N18.7-1976; the Safety Committee is not required to review safety evaluations of changes in the facility which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1)." This correction also will appear in the next revision of the QAPD to be submitted by October 31, 1990.