

1. Personnel Selection and Training

- a) Commitment:  
Regulatory Guide 1.8, Rev. 1-R  
ANS/ANSI 3.1-1978
- b) Exceptions:  
Regulatory Guide 1.8, Rev. 1-R; the issue that is referenced is ANSI N18.1-1971, the commitment is to ANS/ANSI 3.1-1978.

2. Quality Assurance Requirements for Instrumentation and Electrical Equipment

- a) Commitment:  
Regulatory Guide 1.30 (August 1972), and therefore by reference ANSI N45.2.4-1972; are applicable to modification activities, and only to the extent to which these requirements were applicable to the original plant design and construction.
- b) Exceptions:  
None.

3. Operations Quality Assurance

- a) Commitment:  
Regulatory Guide 1.33, Rev. 2, and therefore by reference ANSI N18.7-1976
- b) Exceptions:  
Paragraph 4.5 of ANSI N18.7-1976; an annual review will be specified rather than the stated semiannual review.

Paragraph 4.3.4 (2) of ANSI N18.7-1976; the Safety Committee is not required to review safety evaluations of proposed changes in the facility.

Paragraph 4.5 of ANSI N18.7-1976; an annual management audit of the Operational Quality Assurance Program will be performed to evaluate the effectiveness of the overall program. If the annual management audit is performed under the auspices of the Safety Committee, it can also serve to satisfy the Technical Specifications requirement for the biennial audit by the Safety Committee.

Paragraph 5.2.16 of ANSI N18.7-1976; at the DAEC permanently installed plant instrumentation is controlled by a computer-based preventive maintenance program. Instrumentation that is within its calibration cycle and is acceptable for use does not have calibration stickers applied. Instruments past due for calibration, or otherwise not acceptable for use, are marked with a "do not use" sticker or tag. The calibration due date information required by ANSI N45.2.4-1972 (referenced in Paragraph 5.2.16) is available from the computer data base.

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### 4. Cleaning of Fluid Systems

- a) Commitment:  
Regulatory Guide 1.37, Rev. 0, and therefore by reference ANSI N45.2.1-1973; are applicable to maintenance and modifications activities, and only to the extent to which these requirements were applicable to the original plant design and construction.
- b) Exceptions:  
None.

### 5. Material Control

- a) Commitment:  
Regulatory Guide 1.38, Rev. 2.  
ANSI N45.2.2-1978.
- b) Exceptions:  
Substitute ANSI N45.2.2-1978 (current version) for 1972 (version endorsed by Regulatory Guide).

Limit the applicability of the requirements of Sections 3 and 4 and the Appendix of ANSI N45.2.2, and the paragraphs of the Regulatory Guide relating to these Sections (C.1.c, C.1.e and C.2), to procurement of major plant equipment replacements, but not to procurement of operating plant spares and modifications.

Additionally, shipping damage inspections (para. 5.2.1) will be performed by Storekeepers prior to unloading in lieu of ANSI N45.2.6 certified inspectors.

### 6. Housekeeping

- a) Commitment:  
Regulatory Guide 1.39, Rev. 2, and therefore by reference ANSI N45.2.3-1973.
- b) Exceptions:  
None.

### 7. Qualifications of Inspection, Examination and Testing Personnel

- a) Commitment:  
Regulatory Guide 1.58, Rev. 1 and therefore by reference ANSI N45.2.6-1978.

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- b) Exceptions:  
Paragraph 1 of Section C of Regulatory Guide 1.8 shall be followed for personnel who perform preoperational, startup and operating tests, in lieu of ANSI N45.2.6-1978. The test procedure shall be reviewed and approved by a committee consisting of members representing a broad range of experience in engineering, operation and quality assurance; the tests shall be performed by qualified personnel and monitored by quality assurance personnel to ensure compliance with the test procedure requirements.

### 8. Seismic Design Classification and Response Spectra for Fuel Rods

- a) Commitment:  
Regulatory Guide 1.61, Rev. 0 for the design of spent fuel storage racks only.
- b) Exceptions:  
None.

### 9. Design Control

- a) Commitment:  
Regulatory Guide 1.64, Rev. 2 and by reference ANSI N45.2.11 (1974).
- b) Exceptions:  
Paragraph 2 of Section C of Regulatory Guide 1.64 places certain restrictions on design verification by supervisory personnel. Instead of the requirements of Regulatory Guide 1.64, relative to design verification by supervisory personnel, Iowa Electric Light and Power Company will adhere to the requirements of ANSI N45.2.11 - 1974, Paragraph 6.1.

### 10. Quality Assurance Terms and Definitions

- a) Commitment:  
Regulatory Guide 1.74, Rev. 0, and therefore by reference ANSI N45.2.10-1973.
- b) Exceptions:  
If a term is defined differently in ANSI N45.2.10-1973 and the Glossary of Terms of this Manual, then the definition contained within the Glossary of Terms shall take precedence.

### 11. Records

- a) Commitment:  
Regulatory Guide 1.88, Rev. 2 and therefore by reference ANSI N45.2.9-1974.

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- b) Exceptions:  
Paragraph 3.2.2 of ANSI N45.2.9; Appendix A to the Quality Assurance Manual indicates the recommended record retention times for various types of records. The specific record retention times for records will be indicated upon transmittal of the records for permanent storage. This transmittal log will also indicate where the records are stored and their location within the permanent storage area.

Paragraph 4.3 of ANSI N45.2.9; The requirements shall only be implemented for the permanent record files, and not for temporary record files.

Paragraph 5.3 of ANSI N45.2.9; The requirements shall only be implemented for the permanent record files, and not for temporary record files.

### 12. Quality Assurance Requirements for Structural Concrete and Steel

- a) Commitment:  
Regulatory Guide 1.94, Rev. 1, and therefore by reference ANSI N45.2.5-1974; are applicable to modification activities, and only to the extent to which these requirements were applicable to the original plant design and construction.
- b) Exceptions:  
None.

### 13. Quality Assurance Requirements for Mechanical Equipment

- a) Commitment:  
Regulatory Guide 1.116, Rev. 0-R, and therefore by reference ANSI N45.2.8-1975; are applicable to modification activities, and only to the extent to which these requirements were applicable to the original plant design and construction.
- b) Exceptions:  
None.

### 14. Procurement Control

- a) Commitment:  
Regulatory Guide 1.123, Rev. 1 and therefore by reference, ANSI N45.2.13-1976 and Section 5.2.13 of ANSI N18.7-1976.
- b) Exceptions:  
None.

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### 15. Audits

a) Commitment:

Regulatory Guide 1.144, Rev. 0 and therefore by reference ANSI N45.2.12-1977.

b) Exceptions:

Paragraph C, 3b of Regulatory Guide 1.144; External audits after award of contract are not necessary for procurement actions where acceptance of the product is by receiving inspection. The Iowa Electric Light and Power Company external audit schedule will include those suppliers which are expected to provide equipment or services for the Duane Arnold Energy Center during the forthcoming year. External audits will be scheduled based upon the importance of activities scheduled, and past performance of the supplier in performing those activities.

Paragraph 2 of ANSI N45.2.12-1977; the qualification of auditing personnel will be in accordance with ANSI N45.2.23-1978.

Paragraph 4.4 of ANSI N45.2.12-1977; the audit report shall be signed by the Lead Auditor, or a qualified designee.

### 16. Qualifications of Quality Assurance Program Audit Personnel

a) Commitment:

Regulatory Guide 1.146, Rev. 0, and therefore by reference ANSI N45.2.23-1978.

b) Exceptions:

None.

### 17. Ten-Year Inspection Program

a) Commitment:

ASME B & PV Code, Section XI, 1980 Edition with Addenda through Winter 1981.

b) Exceptions:

Exceptions are established in formal correspondence with the Nuclear Regulatory Commission and incorporated into appropriate Iowa Electric Light and Power Company documents.

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18. Pump and Valve Test Program

a) Commitment:

ASME B & PV Code, Section XI, 1980 Edition with Addenda through Winter 1981.

b) Exceptions:

Exceptions are established in formal correspondence with the Nuclear Regulatory Commission and incorporated into appropriate Iowa Electric Light and Power Company documents.

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Quality Level II

Codes, Standards and Regulatory Guides

1. Design Guidance for Radioactive Waste Management Systems

a) Commitment:  
Regulatory Guide 1.143, Rev. 1.

b) Exceptions:

Paragraph C1.1.3 - The commitment is limited to the seismic methods used in the original construction of the plant and not upgraded to 1.143 standards.

Paragraph C2.1.3 - The commitment is limited to the seismic methods used in the original construction of the plant and not upgraded to 1.143 standards.

Paragraph C3.1.3 - The commitment is limited to the seismic methods used in the original construction of the plant and not upgraded to 1.143 standards.

Paragraph C4.3 - Systems will be fabricated in accordance with good operability, maintenance and repairability practices.

Paragraph C6 - The requirements of Iowa Electric's Quality Assurance Program for Quality Level II structures, systems, components, and related activities will apply but are limited to the radwaste pressure retaining boundaries.

2. Radiation Monitoring

a) Commitment:  
Regulatory Guide 4.15, Rev. 1.

b) Exceptions:  
None.

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