



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

APR 26 1990

Docket No. 50-331

Iowa Electric Light and Power
Company
ATTN: Mr. Lee Liu
Chairman of the Board
and Chief Executive
Officer

IE Towers
P. O. Box 351
Cedar Rapids, IA 52406

Gentlemen:

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP 8) Report for the Duane Arnold Nuclear Plant, and our meeting of March 29, 1990, which discussed in detail the contents of the report and your written comments dated April 25, 1990 relative to the report.

Based on the formal exchange of information between our respective staffs, and in the absence of verbal identification of discrepancies within the report or formal written comments from you requiring resolution, no changes to the Initial SALP Report are necessary. As such, the Initial SALP Report dated March 7, 1990, is considered to be the Final SALP Report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter with the referenced enclosures, will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have questions regarding the Final SALP Report, please let us know and we will be pleased to discuss them with you.

Sincerely,

A. Bert Davis
Regional Administrator

Enclosures:

1. Final SALP 8 Report
No. 50-331/90001
(Meeting Summary)
2. Licensee Response Ltr,
dtd 4/25/90

See Attached Distribution

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IE40
41

Distribution

cc w/enclosures:

R. Hannen, Plant

Superintendent - Nuclear

R. Salmon, Technical Services

Superintendent

DCD/DCB (RIDS)

Licensing Fee Management Branch

Resident Inspector, RIII

John A. Eure, Iowa Department
of Public Health

J. H. Sniezek, DEDRO

T. E. Murley, NRR

K. M. Carr, Chairman

T. M. Roberts, Commissioner

K. C. Rogers, Commissioner

J. R. Curtiss, Commissioner

F. J. Remick, Commissioner

J. R. Hall, NRR Project Manager

J.N. Hannon, NRR Director, Project Directorate III-3

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L. A. Reyes, RII

L. R. Greger, RIII

M. J. Pearson, RIII

L. L. Cox, RIII

RIII Files

Enclosure 1

SALP 8

FINAL SALP REPORT

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

50-331/90001
Inspection Report No.

Iowa Electric Light and Power Company
Name of Licensee

Duane Arnold Energy Center
Name of Facility

November 1, 1988 - December 31, 1989
Assessment Period

~~9005070250~~ 2pp

Duane Arnold Energy Center

A. Summary of Meeting with Iowa Electric Light and Power Company on March 29, 1990

The findings and conclusions of the SALP Board are documented in Report No. 50-331/90001 and were discussed with the licensee on March 29, 1990, at Duane Arnold Energy Center Training Center.

While the meeting was primarily a discussion between the licensee and NRC, it was open to members of the public as observers.

The following licensee and NRC personnel were in attendance.

Iowa Electric Light and Power Company

Lee Liu, Chairman of the Board and Chief Executive Officer
L. Root, President and Chief Operations Officer
R. McGaughey, Vice President, Production
D. Mineck, Manager, Nuclear Division
R. Hannen, Plant Superintendent, Nuclear
Other members of the Iowa Electric Light and Power Company

Nuclear Regulatory Commission

C. J. Paperiello, Deputy Regional Administrator
W. L. Forney, Deputy Director, Division of Reactor Projects
R. L. Hague, Chief, Reactor Projects Section 3C
J. R. Hall, Project Manager, NRR
M. E. Parker, Senior Resident Inspector
C. G. Miller, Resident Inspector
J. W. Clifford, Region III Coordinator, EDO

B. Comments Received from Licensee

Iowa Electric Light and Power Company's response to the Duane Arnold Initial SALP 8 Report dated March 7, 1990, had no comments requiring revision to the specific content of the report. Because there is no revision, the Initial SALP Report is considered the Final SALP Report.

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.

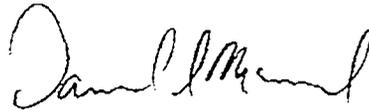
In the area of Environmental Qualification (EQ), training sessions have begun for those professional and Iowa Electric field (craft) personnel involved in implementing our EQ program, which covered not only the basics of our EQ program, but also the "lessons-learned" from our recent EQ problems. The 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.

Mr. A. Bert Davis
April 25, 1990
NG-90-1006
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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+

cc: U. S. NRC Document Control Desk (Original)
R. Browning
L. Liu
L. Root
R. McGaughy
J. R. Hall (NRR)
NRC Resident Inspector - DAEC
Commitment Control No. 900052