

Iowa Electric Light and Power Company  
December 23, 1981  
LDR-81-352

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
OF NUCLEAR DIVISION

THE HQ FILE COPY



Mr. Norman C. Moseley, Director  
Division of Program Development and Appraisal  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Moseley:

This letter is in response to your November 20, 1981 letter, regarding Performance Appraisal Inspection 50-331/81-24 of the Duane Arnold Energy Center (DAEC).

The following is an outline of steps we are taking to improve areas of weaknesses identified in your November 20, 1981, letter and report.

#### COMMITTEE ACTIVITIES

The following paragraphs describe our plan to strengthen the Operations Committee and Safety Committee. As implementation of this plan progresses it may be necessary to make minor modifications to the plan.

Both Committees have drafted new Charters which we plan to implement on an interim basis by February 1, 1982. It is our intent to have final Charters approved and fully implemented by June 1, 1982.

Both Charters call for a full-time assistant for each Committee to serve as a staff member. Each assistant's responsibilities will include assurance that the respective committees are meeting all requirements and commitments. It is our intent to have a full-time consultant for each Committee by February 1, 1982 who will serve until qualified Iowa Electric employees are named.

Both Committees will have regularly scheduled meetings with agendas published in advance. The Charters will specify membership qualifications and training requirements, documentation of consensus and dissenting views, requirements for content and dissemination of Committee Minutes, and review of appropriate reports including Quality Assurance Audit Reports.

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In addition to the above, the Safety Committee Charter will limit the use of alternates and designates the DAEC Chief Engineer and Manager, Quality Assurance as permanent members. Responsibility for administration of Safety Committee audits is given to the Quality Assurance Department. A proposed schedule for Safety Committee audits has been published. Two audits have already begun. Audit plans and procedures will require Safety Committee approval.

A minor revision to the Technical Specifications is being processed and we plan on submitting this by January 1, 1982. This revision documents the present organization at the DAEC and has the Safety Committee reporting to the company Executive Vice President rather than the President. These were the only necessary changes identified in a review of the Technical Specifications and Charters. As the above plans are implemented, further revisions to the Technical Specifications will be proposed as necessary.

#### NON-LICENSED TRAINING

A revised outline of non-licensed training and retraining objectives has been completed. Available training resources will be reviewed with the objective of developing a comprehensive training and retraining plan for non-licensed personnel. The scope of this effort will be developed by March 15, 1982. This plan will include training for non-licensed operators, maintenance personnel and corporate personnel.

Training programs will be based on written course outlines and lesson plans and will be evaluated for effectiveness by management on a continuing basis.

#### CORRECTIVE ACTION SYSTEMS

Iowa Electric personnel are presently receiving training on the present corrective action systems. This training will be complete prior to February 15, 1982.

An evaluation of the corrective action systems is a part of the modification and upgrading of the Iowa Electric Quality Assurance Program. This task, which includes an evaluation of the Maintenance Action Request (MAR) System, is expected to be complete by December 31, 1982.

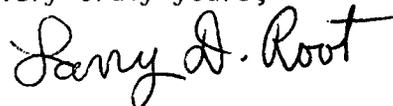
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The trending and analysis of corrective action systems will be reviewed concurrent with the above task and procedures revised, as necessary, to assure an effective system is functioning in all appropriate areas. The Safety Committee is presently conducting an audit of all actions taken to correct deficiencies. This audit includes a determination of whether conditions adverse to quality are evaluated properly for root causes and generic implications. A schedule for corrections required will be developed with the response to the audit.

Iowa Electric is carefully reviewing all the findings made in the Performance Appraisal with a view to more effective operation of the DAEC.

We will be happy to discuss these matters further with your staff.

Very truly yours,



Larry D. Root  
Assistant Vice President  
Nuclear Generation

LDR/JPM/kmh\*

cc: J. P. McPartland  
NRC Resident Office