

Iowa Electric Light and Power Company

May 28, 1982
LOR-82-143

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
OF NUCLEAR DIVISION

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Duane Arnold Energy Center

Subject: Response to Inspection Report 82-06

File: A-102, NRC-4, Inspection Report 82-06

Dear Mr. Keppler:

This letter is in response to Mr. G. W. Roy's letter concerning an inspection of activities at the Duane Arnold Energy Center conducted on March 29 through April 2, 1982. The following response indicates the actions which have been taken to correct the one item of noncompliance noted in the subject Inspection Report.

Item of Noncompliance

Technical Specification 6.9.1 requires adherence to radiation protection procedures. The following instance of failure to meet this requirement was identified during the inspection.

Procedure RPP 3.2, Section 2.1.5, requires that if an individual's dosimeter is off-scale or missing he shall not be allowed into a protected area until Health Physics is contacted so a determination can be made for the equipment deficiency.

Contrary to the above, it was noted several persons were allowed into the protected area the day after their dosimeters were discharged without notifying Health Physics.

Response

1. Corrective action taken and the results achieved:

This noncompliance was primarily caused by inadequate procedural guidance on resolving problems with off-scale or missing dosimeters. This was evident because the Radiation Protection Procedures (RPPs) dealing with the control of discharged or missing dosimeters were not

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written in sufficient detail to be useful to the security and health physics personnel who were to implement them. A contributing cause of the noncompliance was that personnel who control the dosimeters received inadequate training.

Temporary instructions on the control of discharged or missing dosimeters were issued on April 2, 1982 to security personnel to provide immediate direction until more detailed formal procedures could be issued. These temporary instructions resulted in immediate compliance with RPP 3.2, Section 2.1.5 regarding entry into a protected area if an individual's dosimeter is off-scale or missing.

Formal procedures for the control of personnel dosimetry were issued on May 17, 1982 as new Administrative Control Procedure (ACP) 1407.7. This new procedure consolidates the individual responsibilities of dosimetry users, security personnel, and health physics personnel and details instructions for dosimetry use including deficiency corrective actions. The detailed instructions for dosimetry deficiency corrective actions provided in this new procedure should prevent recurrence of this nonconformance. Appropriate sections of the RPPs have been revised to conform to the provisions of new procedure ACP 1407.7.

Security and health physics personnel were retrained on the control of dosimeters to the provisions of new ACP 1407.7.

2. Corrective action to be taken to avoid further noncompliance:

See Section 1 for corrective action that was taken to avoid further noncompliance.

3. Date when full compliance will be achieved:

Full compliance was achieved on May 25, 1982 when the retraining of security and health physics personnel was completed to the provisions of new procedure ACP 1407.7.

Very truly yours,

Larry B. Root

Larry B. Root
Assistant Vice President
Nuclear Generation

LDR/DMV/p1*

cc: D. Varner
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