

Iowa Electric Light and Power Company

October 29, 1982
NG-82-2259

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

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 82-15

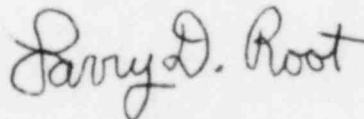
File: A-102, NRC-4, Inspection Report 82-15

Dear Mr. Keppler:

This letter responds to Mr. C. J. Paperiello's letter concerning the routine safety inspection conducted by Messrs. A. G. Januska and S. Rozak on August 9-13, 16 and 23, 1982, at the Duane Arnold Energy Center (DAEC). The response to the one item of noncompliance identified in the Inspection Report is provided in the Attachment. Also provided in the Attachment are the steps to be taken by DAEC to implement the plant chemistry QC program along with dates for completion.

Our delay in providing this response beyond the 30 day requested time frame was discussed between Mr. W. Miller of my staff and NRC representatives Mr. L. Clardy and Mr. A. Januska.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/WMB/pf*

Attachment

cc: M. Bentley
D. Arnold
L. Liu
S. Tuthill

NRC Resident Office

8211230353 821119
PDR ADOCK 05000331
G PDR

Commitment Control Ref: #82-0318

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Attachment

Item of Noncompliance

Section 5.3.A of the Appendix B Environmental Technical Specification (ETS) states in part: "Detailed written procedures or instructions, including applicable checkoff lists, will be prepared, approved and adhered to for operation of all on site DAEC systems and components involved in carrying out the plant environmental monitoring program of Section 2.0. Procedures will include sampling, instrument calibrations, analysis and actions to be taken when limits are approached or exceeded. Calibration frequencies for instruments used in performing the measurements required by the ETS will be included. A Quality Control Program will be followed for the calibration of instruments and sensors and records will be maintained."

The majority of the counting room instruments, especially the gamma spectrometer, are required to do the plant environmental analysis specified in Tables 3.3-1 and 3.3-2 of Section 2.0 of the ETS.

Contrary to the above, the gamma spectrometer is not included in any Quality Control Program nor are procedures written for its calibration.

Response to the Item of Noncompliance

1. Corrective action taken and the results achieved:

Iowa Electric has developed and integrated into the Plant Chemistry Procedures an instrument calibration schedule for laboratory analytical and counting room equipment used in performing the measurements required by the ETS, including the gamma spectrometer. A QC program has been initiated for the gamma spectrometer which involves analysis of blind samples. These analyses will be performed quarterly and will serve as a check of the laboratory equipment, procedures, and technicians. A daily QC check is run on the gamma spectrometer when in use which includes resolution and efficiency. Counting room control charts and gamma spectrometer QC checks are being reviewed monthly by the Chemistry Coordinator.

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

Calibration procedures are being written for counting room instruments which are used in performing the measurements required by the ETS. The gamma spectrometer calibration procedure will be completed by January 1, 1983 and all counting room calibration procedures will be completed by April 1, 1983. In the interim, calibrations will be performed in accordance with the manufacturer's instructions and/or accepted industry standards.

3. Date when full compliance will be achieved:

A QC program will be established and a calibration procedure will be written for the gamma spectrometer by January 1, 1983. The plant chemistry QC program is being implemented on a step-by-step basis. Partial implementation has been achieved with full implementation to be completed by April 1, 1983.

Response to Request for Additional Information

The following is provided as requested in your cover letter for Inspection Report 82-15. The actions described below are intended to improve quality control and management overview for the chemistry and environmental monitoring program at the Duane Arnold Energy Center.

- a) A monthly schedule has been established for review of specific areas of the chemistry and environmental monitoring programs. These reviews were implemented October 1, 1982. These reviews are performed by the Assistant Radiation Protection Supervisor and include monthly reports to Nuclear Generation Division Management along with the status of the items described below in paragraphs b), c), e), and g).
- b) A program has been implemented whereby the Chemistry Coordinator performs a monthly review of all laboratory control charts to verify equipment operability.
- c) A schedule has been issued for the calibration of all laboratory instruments which are used in performing the measurements required by the ETS. Equipment calibrations are being performed according to this schedule.
- d) A special Quality Assurance audit of the Plant Chemistry Program will be performed in an effort to determine the accuracy and performance of the laboratory. This will be completed prior to January 1, 1983.
- e) Prior to November 15, 1982, the existing Chemical Analysis Trending System which trends key chemical parameters will be integrated into the Plant Chemistry Procedures.
- f) Prior to April 1, 1983, calibration procedures for all counting room equipment will be established. In the interim, calibrations will be performed in accordance with the manufacturer's instructions and/or accepted industry standards.
- g) An interlab comparison program where split samples are sent offsite for analysis will be developed and implemented prior to June 1, 1983.