

Iowa Electric Light and Power Company

September 28, 1982
LDR-82-270

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

Dear Mr. Keppler:

This letter is in response to Mr. Streeter's letter of August 27, 1982 regarding Inspection Report No. 50-331/82-08 (DPRP) and associated Notice of Violation.

Violation:

"10CFR50, Appendix B, Criterion XVIII, Audits, states in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with the quality assurance program...followup action, including re-audit of deficient areas, shall be taken where indicated." The licensee is also committed to ANSI N45.2.12. This standard, Section 4.5 states in part, "The audited organization shall take appropriate action to assure that corrective action is accomplished as scheduled." Quality Assurance Manual 1318.1, Revision 2, Audits, Section 5.8, states, "Subsequent audits of a given activity shall include those areas found deficient on the previous audit of that activity."

Contrary to the above, audit I-80-22 finding on procedural violations was not adequately followed up on by the audited or auditing organization to ensure corrective actions were taken. The subsequent audit of the same area, I-81-23 performed in October 1981, stated that all previous audit findings were closed satisfactorily, however, this audit re-identifies portions of the same finding as I-80-22 but did not identify them as repetitive. The licensee proposed different corrective measures which did not reflect the proposed original corrective actions. The original corrective actions were not accomplished until April 1982. Due to inadequate followup and re-audit the licensee was in violation of their procedures for an additional 16 months after the original audit.

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Response:

1. Corrective action taken and the results achieved:

As stated in paragraph 7 of the inspection report, "details" section, the immediate corrective action for Administrative Control Procedure 1406.2 was the signing off and implementation of the revision on April 12, 1982. The purpose of the revision in question was to reduce unnecessarily restrictive administrative controls on limited service-life items and to eliminate the requirement for an unnecessary listing of a summary of equipment repair procedures.

In late 1981 the Quality Assurance audit policy was changed such that, except for special circumstances, audit findings are no longer closed based upon Document Change Forms or any other form of commitment. Open findings will be tracked and not closed until the corrective action is complete. In addition, the auditors were instructed in August of 1982 to review closed audit findings from previous audits when conducting a new audit on the same topic. This process, now implemented, will identify repetitive problems and determine whether previous corrective actions have remained effective.

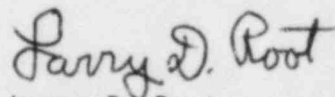
2. Corrective action taken to avoid further non-compliance:

Administrative procedures will be changed to require the monthly review of the Document Change Form Log to identify proposed document changes that have not been approved within three months of the initiation of the change. These document changes will be reported to site management to determine follow-up action.

3. The date when full compliance will be achieved:

Review of the Document Change Form Log, as described in 2. above, will be implemented by October 15, 1982.

Very truly yours,



Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/ELC/jlm*

cc: E. Cox
D. Arnold
L. Liu
S. Tuthill
NRC Resident Office
Ref: Commitment Control No. 82-0270