# Iowa Electric Light and Power Company

June 1, 1984 NG-84-2219

Mr. James G. Keppler 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 NRC Inspection Report 84-05

Dear Mr. Keppler:

This letter is provided in response to Mr. C. J. Paperiello's letter concerning an inspection of activities at the Duane Arnold Energy Center, conducted on April 9 through April 13, 1984. Attachment 1 provides the subject response in accordance with your request.

Very truly yours,

Richard W. McGaughy

Manager, Nuclear Division

RWM/DJH/dmb\*
Attachment 1. Response to Inspection Report 84-05

cc: D. Hingtgen

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#### ATTACHMENT 1

### RESPONSE TO INSPECTION REPORT 84-05

### NRC Item of Non-Compliance

Title 10, CFR 50.54(q) states in part that a licensee authorized to operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards of 10 CFR 50.47(b) to this part and the requirements of Appendix E to this part. Section 0, Paragraph 2.2, of the Duane Arnold Energy Center Emergency Plan, Revision 3, states in part that each member of the emergency response organization will receive general training in the Emergency Plan Implementing Procedures (EPIPs) and specific training related to their expected role during an emergency. Section 0, Paragraph 2.5.1 of the Emergency Plan states that applicable portions of the emergency preparedness training program shall be performed whenever major personnel changes occur and that the entire training program shall be repeated on a yearly basis.

Contrary to the above, two newly appointed Operations Shift Supervisors (OSSs), who are the initial Emergency Coordinators, had not received the required annual refresher training in the DAEC Emergency Plan Implementing Procedures since May of 1982.

# Response to Item of Non-Compliance

1. Corrective Action Taken and the Results Achieved:

During the routine safety inspection conducted on April 9-13, 1984, the inspectors interviewed six OSSs and two Shift Technical Advisors (STAs). That interview indicated that two OSSs had not received the annual Emergency Preparedness Training (EPT) course conducted in August/September, 1983.

The Plant Superintendent-Nuclear directed a review of the situation by the Training Department. Based upon this review, the Training Coordinator assigned an instructor who has prepared and conducted refresher training for the two OSSs.

During the period since EPT was conducted in August/September, 1983, Training Department implemented a Quota Control System to ensure attendance at EPT. This system will permit tracking student attendance and enable the Training Department to follow-up on individuals who do not schedule themselves for attendance or do not report to training as scheduled. This system will ensure personnel receive required training and prevent recurrence of this type of occurrence in the future.

2. Corrective Action to be Taken to Avoid Further Non-Compliance:

All OSSs have been scheduled to receive annual EPT during the period of June 4 through July 20, 1984. The two OSSs indicated in Item 1 above, are included in this schedule in addition to the refresher training discussed in Item 1 above.

All personnel with the potential to become OSSs during the next year have been scheduled to receive training applicable to the OSS position in the Emergency Response Organization. This group includes these persons who are currently taking License Operator Training. This training will be conducted during the period of June 4 through July 20, 1984.

3. Date When Full Compliance Will Be Achieved:

As indicated above, the subject non-compliance was immediately addressed and has been resolved. Actions to avoid further non-compliance have been implemented.