IES Utilities Inc.
200 First Street S.E.
P.O. Box 351
Cedar Rapids, IA 52406-0351
Telephone 319 398 8162
Fax 319 398 8192

John F. Franz, Jr.
Vice President, Nuclear

IES UTILITIES

December 22, 1995
NG-95-3462

Mr. James Lieberman, Director
Office of Enforcement
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Change in commitment to require a health physics technician to accompany the worker on initial entry into a high radiation area

Reference: NG-92-2426, letter from J. Franz to J. Lieberman dated May 26, 1992, "Response to Notice of Violation and Proposed Imposition of Civil Penalty (EA 92-056)"

File: A-102, A-105

Dear Mr. Lieberman:

As discussed in the referenced letter, an unplanned exposure event occurred on March 15, 1992 that resulted in two violations of 10 CFR requirements. Violation A concerned failure to determine dose rates for a specific work location in the area of the recirculation system 'A' riser. Violation B concerned failure to instruct workers adequately in (1) the operation of their digital dosimeters; (2) the appropriate response to the digital dosimeter alarms; and (3) the actual radiation levels in their work area. In response to these violations, a commitment was made to develop additional written guidance, which would require a health physics technician to accompany the worker on initial entry into a high radiation area to determine work area dose rates. Since this commitment was made and implemented, several significant improvements to the Health Physics and the As Low As Reasonably Achievable (ALARA) programs have been made that eliminate the necessity for this commitment. All workers are now trained in General Employee Training (GET) on the proper use of electronic dosimeters, including the appropriate responses to alarms. In addition, a special training course for all personnel was recently completed on electronic dosimetry which re-emphasized the appropriate use of these dosimeters and the

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response to alarms. Telemetric dosimeters are being used more aggressively for high radiation area coverage. These dosimeters allow continuous monitoring by health physics technicians of personnel exposure and current exposure rates during work activities in selected high radiation areas. Planning for high radiation area work is more comprehensive than in the past, which coupled with the increased use of electronic monitoring, provides better coverage for workers in high radiation areas. Additionally, survey techniques have been upgraded and periodic training on survey techniques is provided in continuing training for health physics technicians. A practical exam for contract health physics technicians has been developed, which requires contract technicians to demonstrate the appropriate knowledge for surveying and job coverage in high radiation areas.

Since the implementation of these program improvements, surveys which we agreed in 1992 to perform are unnecessary. Furthermore, these surveys subject health physics technicians to unnecessary radiation exposure. Therefore, if survey information is already available for the work area, a health physics technician is no longer required to accompany the worker on initial entry into a high radiation area to determine work area dose rates.

No new commitments have been made in this letter.

If you have any questions regarding this matter, please contact my office.

Sincerely,

John F. Franz
Vice President, Nuclear

cc: D. Barta
L. Liu
B. Fisher
G. Kelly (NRC-NRR)
H. Miller (Region III)
P. Louden (Region III)
K. Selburg (Region III)
NRC Resident Office
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