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John F. Franz, Jr.
Vice President, Nuclear

January 30, 1998
NG-98-0172

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D.C. 20555-0001

Subject: Duane Arnold Energy Center
Docket No. 50-331
Op. License No: DPR-49
Reply to a Notice of Violation Transmitted with Inspection Report 97017
File: A-105, A-102

Dear Sir:

This letter and attachment are provided in response to the Notice of Violation transmitted with NRC Inspection Report 97017.

This letter contains no new commitments.

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

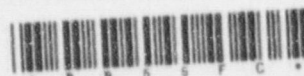
Sincerely,

John F. Franz
Vice President, Nuclear

Attachment: Reply to a Notice of Violation Transmitted with Inspection Report 97017

cc: L. Sueper
L. Root
D. Wilson
G. Kelly (NRC-NRR)
A. B. Beach (Region III)
NRC Resident Office
DOCU

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IES Utilities Inc.
Reply to a Notice of Violation
Transmitted with Inspection Report 97017

VIOLATION

Technical Specification 6.9.1 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Administrative Control Procedure 1411.20, "Respiratory Protection," Revision 5, implements the above requirement by requiring that each respirator wearer be fit tested within the previous 12 months plus 30 days.

Special Order [SO] 97-01 ["Respirator Qualifications"] requires that members of certain job classifications such as Operating Shift Supervisors and Shift Technical Advisors, must be respirator and self-contained breathing apparatus qualified.

Contrary to the above, the NRC identified on December 18, 1997, that three individuals designated as requiring annual respirator fit testing were overdue for this training. Specifically, two operating shift supervisors were not fit tested within 14 and 15 months respectively, and a shift technical advisor was not tested within 18 months.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO THE VIOLATION:

1. REASON FOR THE VIOLATION

All badged plant staff are required to undergo annual general employee training (GET) to maintain their plant access. During regularly scheduled GET sessions, personnel who are also required to maintain respirator fit qualifications (as designated in SO 97-01) are expected to re-qualify. When a normal session cannot be attended due to shift schedule conflicts, GET re-qualification and respirator fits can be administered by appointment. This violation was caused by an inadequate tracking system and an unclear assigned responsibility to ensure management's expectations were being met. Specifically:

- A lack of individual accountability for completion of required respirator qualifications led the individuals to fail to obtain the required respirator fit within the specified time frame after completion of GET.

- A lack of a tracking process to notify responsible supervision that personnel had expired qualifications contributed to the violation.
- Additionally, an overall lack of assigned responsibility to ensure required qualifications are maintained contributed to the violation.

2. **CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED**

An Action Request (AR 972919) was generated to document and resolve this issue. As a result of the efforts associated with AR 972919, the following actions have been taken:

- The three individuals were respirator fit re-qualified prior to assuming their next scheduled watch.
- Changes were made to GET training to identify those individuals requiring respirator fit re-qualification at the time of class registration and to ensure the timely availability of technicians to support respirator fit tests.
- The monthly Training Center report to supervisors has been modified to identify individual qualifications such as respirator fit or self-contained breathing apparatus training which have expired.
- Individuals with expired respirator qualifications will be required to obtain extensions from the Plant Manager to retain plant access.

3. **CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

All corrective actions to prevent further violations have been completed.

4. **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance was achieved on December 24, 1997 when the respirator fit of all required individuals was completed.