

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

CENTRAL FILES

JUN 21 1976

Iowa Electric Light and
Power Company
ATTN: Duane Arnold
President
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52406

Docket No. 50-331

Gentlemen:

Thank you for your letters dated March 22, 1976 and June 3, 1976, informing us of the steps you have taken to correct the non-compliance, the deviations, and other items requiring further management attention, which we brought to your attention in our letter dated March 1, 1976. Based on a telephone conversation with your Mr. Hammond regarding the implementation of your work inspection program, it is our understanding that the inspectors will begin integrating with DAEC activities upon completion of their formal training on or before December 1, 1976. We will examine your corrective action during a future inspection.

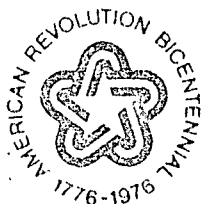
Your cooperation with us is appreciated.

Sincerely yours,

James G. Keppler
Regional Director

cc: G. G. Hunt, Chief Engineer

bcc w/ltrs dtd 3/22/76 and 6/3/76:
Central Files
IE Mail and File Unit
PDR
Local PDR
NSIC
TIC



IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office

CEDAR RAPIDS, IOWA

March 22, 1976

JAMES A. WALLACE
VICE PRESIDENT - GENERATION

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Duane Arnold Energy Center

Subject: Response to letter from James Keppler
to Duane Arnold dated March 1, 1976

File: A-110b, Inspection Report 76-01

Dear Mr. Keppler:

This letter is in response to your letter of March 1, 1976 concerning an inspection of activities at the Duane Arnold Energy Center conducted on January 12-16, 28-29 and February 2-3, 1976. The following responses indicate the actions which have been or will be taken to correct the items in the cover letter, infractions and deviations, where appropriate.

The following four items were discussed in your cover letter:

1. The system which provided follow-up on items of noncompliance, reportable occurrences, and recommended actions which result from site and corporate reviews would be fully implemented.

Response

The initial procedure for utilization of the commitment control system was completed on December 31, 1975. The system has been used on functional basis pending interdepartmental approvals since January 26, 1976. Final approval and full implementation is expected by March 31, 1976.

2. The following WASH documents would be reviewed and program implemented as appropriate to comply with the provisions of these documents:
 - a. WASH 1284 (October 26, 1974), "Guidance on Quality Assurance Requirements During the Operating Phase of Nuclear Power Plant".

MAR 2 -

- b. WASH 1309 (May 10, 1974), "Guidance on Quality Assurance During the Construction Phase of Nuclear Power Plants".
- c. WASH 1283 (May 24, 1974), "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants - Revision 1".

Response

The WASH documents will be reviewed by September 15, 1976 and, based on the review, an implementation date or dates for appropriate programs will be established.

- 3. Your efforts regarding the Emergency Plan Program would be appraised to ensure that the plan commitments are met in a timely manner.

Response

A continuous effort is made to review, change and adhere to the requirements of the Preparedness Plan in order to have an excellent program.

Recent efforts in the area of fire protection for DAEC have resulted in obtaining an agreement with the local fire department.

The use of construction crafts are being used at the present time to accelerate the final construction of the Alternate Emergency Coordination Center.

As stated in our response to NRC, IE Inspection Report No. 050-331/75-19, we have taken positive steps to increase the effectiveness of our management control in order to insure timely completion of commitments.

- 4. Work priorities would be reviewed to provide a more timely completion and implementation of your fire protection plan. Separate correspondence on this matter has been forwarded to you from our office.

Response

We have reviewed our work priorities and have responded in a letter dated February 26, 1976 from Mr. J. Wallace to Mr. James Keppler outlining a more timely implementation of portions of our fire plan.

The following items were discussed in the Summary of Findings section of the Inspection Report:

B. Infractions

- 1. Contrary to Technical Specifications, Section 6.4.1, Quality Assurance Directive 1301.5, and Administrative Control Directive 1401.5, Paragraph 5, a program for training and retraining has

not been fully implemented for DAEC nonlicensed plant personnel.
(Paragraph 5, Report Details.)

Response

1. Corrective action taken and the results achieved:

Not applicable.

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

A review and necessary modifications will be made to the present training, retraining and replacement training for DAEC nonlicensed personnel and a program will be set up that complies with the intent of Section 6.4 of the Technical Specification, QAD 1301.5 and ACP 1401.5.

3. Date when full compliance will be achieved:

A sincere, concerted effort will be made to complete the review, set up a program and implement appropriate training of DAEC nonlicensed personnel by January 1, 1977.

2. Contrary to Section X of 10 CFR Part 50, Appendix B, and the licensee's Quality Directive 1310.1, the licensee has failed to implement the work inspection program for maintenance activities as required by the directive. (Paragraph 6, Report Details.)

Response

1. Corrective action taken and the results achieved:

Not applicable.

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

A review of work inspection program requirements will be completed by June 1, 1976 for scope, manpower requirements and procedure revisions requirements. After this review is completed, a systematic approach for hiring and training personnel, procedure revising and starting a work inspection program will be developed. This approach to a viable work inspection program will be completed by July 15, 1976.

3. Date when full compliance will be achieved:

Once the review and systematic approach to a work inspection program is developed by July 15, 1976, a date for implementation of a work inspection program will be available.

3. Contrary to Section 3.12.C of the Technical Specifications, on January 10, 1976, the Minimum Critical Power Ratio (MCPR) was

exceeded and the required action was not initiated within fifteen minutes to restore MCPR to the required value within the required two hours. (Paragraph 3, Report Details.)

Response

As stated in your letter of March 1, 1976, the corrective actions to prevent a further occurrence of this item were completed prior to the completion of the site inspection. No further response is required.

E. Deviations

1. Contrary to the licensee's commitment to follow the guidance of WASH 1284 (October 26, 1974), "Guidance on Quality Assurance Requirements During the Operating Phase of Nuclear Power Plants":
 - a. The licensee has failed to train and certify inspectors in accordance with Regulatory Guide 1.58 and ANSI N45.2.6-1973, "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel". (Paragraph 6, Report Details.)

Response

1. Corrective action taken and the results achieved:

Not applicable.
2. Corrective action to be taken to avoid further noncompliance:

As this Deviation is an integral part of Infraction - item 2, the same corrective action applies as stated in Infraction - item 2.
3. Date when full compliance will be achieved:

Same as Infraction - item 2.
- b. Failed to fully implement the Housekeeping Requirements of Regulatory Guide 1.39 and ANSI N45.2.3-1973. (Paragraph 4, Report Details.)

Response

1. Corrective action taken and the results achieved:

Not applicable.
2. Corrective action to be taken to avoid further noncompliance:

A review and necessary modifications will be made to our present housekeeping program relative to Regulatory Guide 1.39 and ANSI N45.2.3-1973.

3. Date when full compliance will be achieved:

A sincere, concerted effort will be made to complete the review, revise our present program where necessary and implement it to meet the intent of Regulatory Guide 1.39 and ANSI N45.2.3-1973 by January 1, 1977.

- c. Failed to implement the Programatic Requirements of Regulatory Guide 1.37 and ANSI N45.2.1-1973 for cleaning of fluid systems and associated components of water cooled nuclear power plants. (Paragraph 8, Report Details.)

Response

1. Corrective action taken and the results achieved:

Not applicable.

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

A review and necessary modifications will be made to our present program for cleaning fluid systems and associated components relative to Regulatory Guide 1.37 and ANSI N45.2.1-1973.

3. Date when full compliance will be achieved:

A sincere, concerted effort will be made to complete the review, revise our present program where necessary and implement it to meet the intent of Regulatory Guide 1.37 and ANSI N45.2.1-1973 by November 1, 1976.

2. Contrary to the licensee's commitment ^{14/}, all remaining ACP's undergoing trial use and procedures for like replacement of part on safety related equipment were not issued by December 1, 1975. (Paragraph 2.b, Report Details.)

Response

1. Corrective action taken and the results achieved:

A letter, DAEC 76-11, dated January 22, 1976 from J. Wallace to J. Keppler was sent to NRC outlining the reasons why the two commitment dates were missed and stating new commitment dates.

The two new commitment dates of February 15, 1976 and March 1, 1976, respectively, were met.

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

March 22, 1976

All commitment dates will be entered on a punch list at DAEC in addition to the formal commitment system coordinated by ie: Engineering.

3. Date when full compliance will be achieved:

The remaining ACP's and like-for-like replacement part procedure commitments have been met.

Very truly yours,



J. A. Wallace
Vice President-Generation

ELH/JAW/ar

c.c. Mr. D. Arnold
Mr. G. Hunt
Mr. E. Hammond
Mr. L. Liu
Mr. D. Wilson
Mr. L. Root
Mr. H. Rehrauer
Mr. G. Cook
Mr. K. Meyer
Mr. J. Newman
Mr. R. Lehman

IOWA ELECTRIC LIGHT AND POWER COMPANY

General Office
CEDAR RAPIDS, IOWA

DUANE ARNOLD
CHAIRMAN OF THE BOARD
AND PRESIDENT

DUANE ARNOLD ENERGY CENTER

P. O. Box 351

Cedar Rapids, Iowa 52406

June 3, 1976

IE-76-845

Mr. James G. Keppler, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Duane Arnold Energy Center
Subject: Response to letter from James Keppler
to Duane Arnold dated March 1, 1976
File: A-110b, Inspection Report 76-01

Dear Mr. Keppler:

This letter is in response to Mr. Gaston Fiorelli and Mr. Harry Kister's request for more information relative to our response dated March 22, 1976, to Inspection Report 76-01. The items are listed and numbered below to correspond to our original letter and reflect the requested information.

It should be emphasized that many commitment dates are in effect as a result of various Reportable Occurrences, IE Inspection Reports, Technical Specification requirements, IE Bulletins and ie: Quality Assurance requirements and the commitment dates stated in our original letter reflected the most realistic ones when integrated into other commitments. The information stated below outlines the present DAEC efforts in meeting the dates stated in our earlier letter.

Cover Letter Item 2

The three WASH documents will be reviewed by the following dates:

- a) WASH 1309 reviewed by June 15, 1976.
- b) WASH 1283 reviewed by August 1, 1976.
- c) WASH 1284 reviewed by September 15, 1976.

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Mr. James G. Keppler
June 3, 1976

A consultant has been hired to develop a matrix that will outline our needs to comply with the intent of these documents. At the present time, full compliance with the three documents is anticipated by September 1, 1977 - work inspection program being the last one to be completed. The work inspection program detail is discussed in Infraction B.2 below.

Infraction B.1

A consultant has been hired to review and recommend the proper approach to meet the intent of Section 6.4.1 of the Technical Specifications, QAD 1301.5 and ACP 1401.5. In addition to the consultant, a position for Training Coordinator has been approved in order to provide a permanent staff member who will be responsible for training of licensed and non-licensed personnel. Until the Training Coordinator position has been filled, a Shift Supervising Engineer is being utilized full time as a Training Coordinator.

The training program implementation date of January 1, 1977, to comply with the intent of the three documents, is the same as stated in our earlier letter.

Infraction B.2

At the present time, work inspection at DAEC is performed by three separate methods. First, supervisors monitor the work activities of the maintenance personnel by on the job checks. Second, the maintenance personnel via their expertise are assigned specific work depending on their skills. Third, the Quality Department perform audits of proper procedure use and step by step maintenance work. Corrective Action Requests are issued if variance is noted relative to written procedures.

However, in order to meet the intent of WASH 1284 work inspection requirements, we have developed an outline of tasks and completion dates for a work inspection program. Attachment 1 is the outline of the proposed program development.

A consultant has been hired to expedite the first few phases of the program and assure that the phase completion dates are done on schedule.

Deviation 1.b

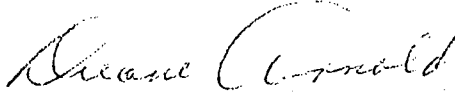
During the review of the WASH documents mentioned in Cover Letter Item 2 above, the housekeeping requirements of Regulatory Guide 1.39 and ANSI N45.2.3-1973 will be reviewed relative to our present program. Once this portion of the WASH document review is completed, appropriate procedures and controls will be developed to implement the Regulatory Guide 1.39 and ANSI N45.2.3-1973. The anticipated implementation date is to be the same as in our original letter - January 1, 1977.

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Mr. James G. Keppler
June 3, 1976

Deviation 1.c

During the review of the WASH documents mentioned in Cover Letter Item 2 above, the requirements of Regulatory Guide 1.37 and ANSI N45.2.1-1973 will be reviewed relative to our present program for cleaning fluid systems and associated components. Once this portion of the WASH document review is completed, appropriate procedures and controls will be developed to implement the Regulatory Guide 1.37 and ANSI N45.2.1-1973. The anticipated implementation date is to be the same as in our original letter - November 1, 1976.

Very truly yours,



Duane Arnold
Chairman of the Board and President

DA/st

cc: J. Wallace
G. Hunt
E. Hammond
L. Liu
D. Wilson
L. Root
H. Rehrauer
G. Cook
K. Meyer
J. Newman
R. Lehman

Attachment #1

DAEC Inspection Program Priorities

Completion Date

- | | |
|---------|---|
| 6-1-76 | I. Organization Charts (completed) |
| 8-1-76 | II. Review of Governing Criteria (App. B.,
WASH Documents, ANSI Documents, etc.) |
| 8-1-76 | III. Hire Inspectors |
| 10-1-76 | IV. Determination of Scope of Inspection Program |
| 11-1-76 | V. Write Inspection Program |
| 12-1-76 | VI. Write Inspection Training Program |
| 12-1-76 | VII. Train Inspectors |
| 1-1-77 | VIII. Write Inspection Job Description Detail
Responsibilities |
| 2-1-77 | IX. Re-write Present Procedures |
| 5-1-77 | X. Train DAEC Maintenance Personnel |
| 9-1-77 | XI. DAEC Inspection Program Implementation
and Phase-In. |