

Iowa Electric Light and Power Company

JOHN F. FRANZ, JR.
VICE PRESIDENT, NUCLEAR

March 19, 1993
NG-93-0973

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

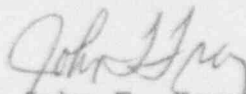
Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to a Notice of Violation Transmitted with
Inspection Report 93003
File: A-105, A-102

Dear Dr. Murley:

This letter and attachment are provided in response to the Notice of Violation concerning activities at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact my office.

Very truly yours,



John F. Franz
Vice President, Nuclear

JFF/DSR:so

Attachment: Reply to a Notice of Violation Transmitted with
Inspection Report 93003

cc: D. Robinson
L. Liu
L. Root
B. Pulsifer (NRC-NRR)
A. Bert Davis (Region III)
NRC Resident
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PDR ADOCK 05000331
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Add: NRC/DRP/PRPS
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IOWA ELECTRIC LIGHT AND POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
TRANSMITTED WITH INSPECTION REPORT 93003

VIOLATION

Technical Specification 6.8.1 requires that written procedures involving nuclear safety, including applicable check-off lists and instructions for preventive and corrective maintenance operations which could have an effect on the nuclear safety of the facility be prepared, approved, implemented, and maintained. Administrative Control Procedure 1407.2, "Material Control in the Spent Fuel Pool and Cask Pool", implements this requirement by requiring a Spent Fuel Pool/Cask Pool Storage Permit to be initiated and approved for each item, other than tools, that will be stored in the Fuel Storage or Cask Pool. This procedure also prohibits the storage of items with contact dose rates greater than 35 Rad per hour in the Cask Pool.

Contrary to the above, on September 4, 1992, workers did not initiate and obtain approval on a Spent Fuel Storage Pool/Cask Pool Storage Permit prior to storing a stellite bearing from a control rod blade in the Cask Pool. Further, the stellite bearing had contact dose rates greater than 20,000 Rad per hour.

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

RESPONSE TO VIOLATION

1. Reason for the violation

During the 1992 Spent Fuel Pool cleanup project, the contents of an unlabeled hopper, stored on the bottom of the spent fuel pool since the 1990 cleanup project, were transferred to a disposal liner. The liner was surveyed and a hot spot of approximately 1500 Rad per hour was discovered. The source of the hot spot was found to be a stellite bearing which was apparently retrieved from the bottom of the spent fuel pool during the 1990 cleanup project and stored in the hopper. It was determined during the 1992 cleanup project that the bearing could not be transferred into the spent fuel pool because the gate between the spent fuel pool and cask pool was not operating properly. Cleanup project members decided to place the stellite bearing in a bucket suspended from the cask pool railing. A note was attached to the rope which stated, "Caution, Stellite Ball, Contact HP Prior to Moving."

The 1992 Cleanup Project team was unaware of Administrative Control Procedure 1407.2, "Material Control in the Spent Fuel Pool and Cask Pool," and relied on Radwaste Procedure 3401.7, "Controls for Disposal of Irradiated Components." Therefore, no storage permit was initiated nor was approval obtained to store the stellite bearing in the cask pool as required by ACP 1407.2. Prior to this violation Radwaste Procedure 3401.7 did not reference Administrative Control Procedure 1407.2, or detail the limitations on storage.

The cleanup project was completed in November 1992. The stellite bearing remained in the cask pool until January 1993.

2. The Corrective Steps That Have Been Taken and the Results Achieved

The stellite bearing was transferred from the cask pool into the spent fuel pool on January 21, 1993.

A review of the circumstances surrounding this event has led to changes to DAEC Radwaste Handling Procedure 3401.7, "Controls For Disposal of Irradiated Components," and DAEC Administrative Control Procedure 1407.2, "Material Control In the Spent Fuel Pool and Cask Pool." The intent of these changes is to ensure proper control of, and responsibility for material in the Spent Fuel Pool and Cask Pool.

Radwaste Procedure 3401.7, "Controls For Disposal of Irradiated Components," will be modified to incorporate precautions for storage, administrative controls, and references to assist workers in the proper handling of irradiated materials. DAEC Administrative Control Procedure 1407.2, "Material Control in the Spent Fuel Pool and Cask Pool" will be modified to clarify its applicability and requirements for audits and recordkeeping to enhance personnel's ability to properly control materials in the Spent Fuel Pool and Cask Pool.

Signs have been strategically placed around the Spent Fuel and Cask Pools to instruct personnel to consult Administrative Control Procedure 1407.2 "Material Control in the Spent Fuel Pool and Cask Pool," prior to placing, moving or removing items in the two pools.

Additionally, to improve awareness of this event and requirements of the applicable procedures, a "lessons learned" file for future cleanup projects has been created. Health Physics personnel have received briefings outlining the details of this violation. The details of this incident will

also be incorporated into Radwaste Continuing Training for 1993.

3. The Corrective Steps That Will Be Taken To Avoid Further Violations

The aforementioned procedure changes have been initiated and will be completed by 4-15-93. The Radwaste Continuing Training will be completed by 7-1-93.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved January 21, 1993, when the stellite bearing was removed from the Cask Pool and properly logged into storage in the Spent Fuel Pool.