

MEMORANDUM  
NRC - NRR / Document Control  
Desk, Washington, DC  
SUBJECT: CORPORATE PLAN IMPLEMENTING PROCEDURES

NOTIFICATION NO: 40  
DATE: September 17, 1993

Revisions to your controlled copy of the manual, as checked above, are attached. As indicated below, please remove and discard the superseded material and insert the revised material, or perform the changes as directed herein.

| MANUAL CONTENTS |             | REMOVE |         | INSERT |         |
|-----------------|-------------|--------|---------|--------|---------|
|                 |             | REV    | DATE    | REV    | DATE    |
| INDEX           |             | 39     | 4/20/93 | 40     | 9/20/93 |
| CPIP-2.4        | PRF# 93-089 | 4      | 3/04/92 | 5      | 9/20/93 |

\_\_\_\_\_ DAEC \_\_\_\_\_ Engineering Department  
 \_\_\_\_\_ Nuclear Licensing \_\_\_\_\_X\_\_\_\_\_ Document Control Resource Center  
 \_\_\_\_\_ Emergency Planning Department \_\_\_\_\_ Nuclear Generation Division

Date \_\_\_\_\_

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| 1.3                        | Activation and Operation of the EOF                            | 12          | 12/22/92    |
| 1.4                        | Release of Emergency-Related Information                       | 7           | 02/05/93    |
| 1.5                        | Building Security Implementation                               | 7           | 04/20/93    |
| 1.6                        | Communication and Data Transmission Systems<br>Coordination    | 2           | 07/25/90    |
| 1.7                        | FTS-2000 and Emergency Response Related<br>Communications      | 0           | 11/25/92    |
| 2.1                        | Dose Assessment and Protective Action<br>Recommendations       | 11          | 12/11/92    |
| 2.2                        | Technical Support Coordination                                 | 4           | 01/07/91    |
| 2.3                        | Administrative Services and Corporate Response<br>Coordination | 5           | 11/25/92    |
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| 4.1                        | Maintenance of Emergency Preparedness                          | 9           | 02/05/93    |
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| 5.1                        | Emergency Response and Recovery Director                       | 5           | 07/19/90    |
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| 6.1                        | Recovery and Re-entry  | 0           | 04/01/91    |

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## 1.0 PURPOSE

- 1.1 This procedure provides instructions for Quality Assurance and Quality Control activities in the event of an emergency at the Duane Arnold Energy Center.
  - 1.1.1 This procedure provides guidance for documenting emergency response activities which are not consistent with standard practice, and
  - 1.1.2 Provides instructions/guidance for generating Emergency Quality Deficiency Reports (EQDR) documenting non-routine activities for correction at a later time.

## 2.0 APPLICABILITY

- 2.1 This procedure shall be implemented upon declaration of an ALERT or higher event classification.
- 2.2 If notified during an event classified as a NOTIFICATION OF UNUSUAL EVENT, the Manager, Corporate Quality Assurance, at the Manager's discretion, may direct partial or full implementation of this procedure.

## 3.0 RESPONSIBILITIES

- 3.1 Manager, Corporate Quality Assurance is responsible for:
  - 3.1.1 Directing overall Quality Assurance Department activities, both at Emergency Operations Facility (EOF) and at DAEC.
  - 3.1.2 Ensuring that response activities are monitored to document non-routine activities.
  - 3.1.3 Tracking deviations from normal company practices, policies and procedures.
  - 3.1.4 Ensuring the availability of staff throughout the emergency.
- 3.2 Quality Assurance Procurement Supervisor is responsible for supporting the Manager, Corporate QA, in quality assurance duties at the EOF.



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- 3.3 Quality Control Supervisor is responsible for supporting the Manager, Corporate QA in quality assurance/control activities at the DAEC.

#### 4.0 INSTRUCTIONS

##### NOTE

The occurrence of an emergency situation at the DAEC may result in the suspension of normal quality assurance requirements in activities and events critical to achieving a safe and stable plant condition. These instances must be documented, such that the activity or event can be reviewed and, if necessary, corrected following the conclusion of the emergency situation. Activities occurring during the emergency shall be evaluated to determine if they are nonconforming.

- 4.1 Through communications with the Emergency Response and Recovery Director (ER&RD) and others, the Manager, Corporate Quality Assurance shall determine the scope of QA activities required to support DAEC during an emergency.

##### 4.1.1 Such activities include.

- a. Processing of emergency purchase orders
- b. Supplying source inspectors, or other vendor related support
- c. Determining staffing needs and scheduling these personnel
- d. Communications with the QA/QC staff, and ERO staff
- e. Documenting non-routine activities.
- f. Maintaining emergency event logs

- 4.2 Emergency Event Logs shall be maintained during the emergency event. This log shall document all significant activities involving QA/QC, including those which do not result in issuance of a EQDR.

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#### 4.3 Nonconforming Conditions

- 4.3.1 Emergency Quality Deficiency Reports (EQDRs) (Attachment 1) shall be used to document activities performed during an emergency which are not consistent with routine requirements.
- 4.3.2 During an emergency, Quality Assurance shall permit the performance of activities outside of routine requirements PROVIDED such activities are controlled sufficiently to aid in resolving plant problems and do not jeopardize plant or public safety. EQDRs are to document non-routine activities to permit proper documentation and correction of conditions at a later time.
- 4.3.3 The use of non-standard or non-code components on a temporary basis in a safety related or important to safety system should be justified and documented as nonconforming. A log (Attachment 2, Emergency Quality Deficiency Report Log) shall be maintained that identifies all EQDRs issued during the emergency situation.
- 4.3.4 The Q.C. Supervisor should collect information from the TSC/OSC regarding activities which may be non-conforming. These activities/items should be documented on EQDRs.

#### 4.4 Non-routine design changes

- 4.4.1 Engineering activities are to be performed in accordance with existing administrative, engineering and project procedures, unless waived by the Emergency Response and Recovery Director and documented on an EQDR.
- 4.4.2 Design change packages should contain drawings, installation instructions and operating limitations. These design change packages may require revision to enable use of readily available hardware.

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#### 4.5 Procurement

- 4.5.1 Quality Assurance should permit the purchase of non-standard products during an emergency provided these situations are documented on an EQDR.
- 4.5.2 On procurements, the Manager, Corporate QA shall coordinate with the QA staff regarding vendor purchases and receipt of those products. Receipt inspections are recommended to ensure the product purchased and delivered are the same.
- 4.5.3 Procurement activities are to be performed in accordance with existing procedures, unless waived by the Manager, Corporate Quality Assurance in discussions with the Emergency Response and Recovery Director and the Emergency Support Manager.
- 4.5.4 Non-routine procurements shall be approved by the ER&RD and documented on an EQDR.

#### 4.6 Inspections

- 4.6.1 Inspection of activities during an emergency should be minimized to avoid unnecessary exposure to personnel. Receiving inspections are encouraged to ensure proper parts are received.

#### 4.7 Recovery/Re-entry

- 4.7.1 During the recovery and re-entry phase, QA personnel shall:
  - a. Continue to provide QA/QC coverage in support of priority repairs.
  - b. Write a report which recognizes all nonconforming activities, and provide this report to the ER&RD (historical sequence).
  - c. Continue to provide procurement support.
  - d. Investigate the cause(s) of the emergency.

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#### 4.8 Scheduling/Staffing

4.8.1 A schedule for staffing shall be established to ensure 24 hour, 7 days a week coverage in support of the emergency event.

#### 5.0 REFERENCES

- 5.1 Iowa Electric Corporate Emergency Response Plan
- 5.2 Regulatory Guide 1.74, "Quality Assurance Terms and Definitions," February 1974
- 5.3 ANSI N45.2.10-1973, "Quality Assurance Terms and Definitions"
- 5.4 CPIP 2.2, "Technical Support Coordination"
- 5.5 EPIP 4.3, "Rescue and Emergency Repair Work"

#### 6.0 ATTACHMENTS

- 6.1 Attachment 1, "Emergency Quality Deficiency Report"
- 6.2 Attachment 2, "Emergency Quality Deficiency Report Log"

Approved by: Lisa Henderson Date: 9-7-93  
Supervisor, Emergency Planning

Approved by: Lisa Henderson for Date: 9-7-93  
Manager, Emergency Planning

Approved by: K. E. Lueb Date: 9/09/93  
Manager, Corporate Quality Assurance

Approved by: John Fry Date: 9/10/93  
Vice President, Nuclear



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## ATTACHMENT 1

## EMERGENCY QUALITY DEFICIENCY REPORT (EQDR) (typical)

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|   |           |  |                     |
|---|-----------|--|---------------------|
| TAG PLACED:<br>YES ___ NO ___ # _____                     |           | EMERGENCY QUALITY DEFICIENCY REPORT<br>(EQDR)  | EQDR # _____        |
| Department: _____   |           | Responsible Individual: _____  | Significance: _____ |
| Equipment: _____  |           | System: _____  | Response Due: _____ |
| References: _____   |           |  |                     |
| IDENTIFICATION OF CONCERN:                                |           |  |                     |
| Requirement _____   |           |  |                     |
| Description of Concern _____                              |           |  |                     |
| Evaluation to Prevent Recurrence Required: Yes ___ No ___ |           |  |                     |
| Immediate Action Taken: _____                             |           |  |                     |
| Originator: _____ Date: _____                             |           |  |                     |
| OPERABILITY/REPORTABILITY CONCERN:                        |           |  |                     |
| Operability Concern **                                    | YES NO    | * IF YES TO ANY OF THESE, IMMEDIATELY<br>NOTIFY THE ASSISTANT PLANT SUPERINTENDENT O&M |                     |
| RESPONSE DUE  | * ( ) ( ) | ** Indicate Basis for Decision   |                     |
| 10 CFR 50.72  | * ( ) ( ) | ACTION TAKEN / COMMENTS  |                     |
| 10 CFR 50.73  | * ( ) ( ) | _____  |                     |
| 10 CFR 20   | * ( ) ( ) | _____  |                     |
| 10 CFR 21   | * ( ) ( ) | _____  |                     |
| Other   | * ( ) ( ) | _____  |                     |
| Assistant Plant Superintendent O&M: _____ DR #: _____     |           |  |                     |
| QA/QC Supervisor/ Date: _____ QA Manager/Date: _____      |           |  |                     |



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ATTACHMENT 1  
EMERGENCY QUALITY DEFICIENCY REPORT (EQDR) (typical)  
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|  |  |
|--|--|
| EMERGENCY QUALITY DEFICIENCY REPORT  | EQDR # _____                                     |
| RECOMMENDATION/BASIS FOR REQUIRING CORRECTIVE ACTION TO PREVENT RECURRENCE   |  |
| RECOMMENDED CORRECTIVE ACTION PLAN:<br><div style="text-align: right; font-size: small;"> <input type="checkbox"/> USE AS IS   <input type="checkbox"/> REWORK   <input type="checkbox"/> REPAIR (HARDWARE ONLY)   <input type="checkbox"/> REJECT   <input type="checkbox"/> OTHER<br/>         Engineering Consultation/Recommendation Required: YES _____ NO _____       </div>   |  |
| Responsible individual (from page 1) /Date _____   |  |
| CORRECTIVE ACTION PLAN<br><div style="text-align: right; font-size: small;"> <input type="checkbox"/> USE AS IS   <input type="checkbox"/> REWORK   <input type="checkbox"/> REPAIR (HARDWARE ONLY)   <input type="checkbox"/> REJECT   <input type="checkbox"/> OTHER       </div> <div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%) rotate(-45deg); font-size: 48px; opacity: 0.5;">         SAMPLE       </div> |  |
| Preparer/Date _____  | Responsible individual (from page 1) /Date _____ |

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## ATTACHMENT 1

## EMERGENCY QUALITY DEFICIENCY REPORT (EQDR) (typical)

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| EMERGENCY QUALITY DEFICIENCY REPORT<br>ENGINEERING EVALUATION  |  | EQDR # _____ |     |
|--|--|--------------|-----|
|  |  | YES          | NO  |
| 1. Does the deficient condition constitute a Technical Specification violation, constitute a change to the UFSAR or require a safety evaluation?   |  | ( )          | ( ) |
| 2. Does the deficiency create the possibility of an unreviewed safety question?  |  | ( )          | ( ) |
| 3. Does the Plant Operations Shift Supervisor require immediate notification of the impact of the deficient condition?<br>(Ref 10CFR50.72 requirements)  |  | ( )          | ( ) |
| 4. For those deficiencies that affect plant design, a determination shall be made as to whether or not it is necessary to revise or develop new design documents. (Define those documents)   |  | ( )          | ( ) |
| 5. Is a modification Change Package (e.g. DCP, PMP) or a change to an approved modification package required to resolve the problem?   |  | ( )          | ( ) |
| 6. Does the deficiency affect an ASME Code item, and require the involvement of the AIA/NI? Describe design requirements of the ASME Code which have been impacted. Contact Group Leader, Codes and Materials in Mechanical Engineering. |  | ( )          | ( ) |
| 7. Does the deficiency impact EQ items or an environment which contains EQ equipment? Contact EQ Group of Electrical Engineering for assistance.   |  | ( )          | ( ) |
| 8. For deficiencies with recommended disposition "repair", are the proposed repair steps listed?   |  | ( )          | ( ) |
| 9. Is there any impact on other engineering programs (e.g. fire protection, IPE, etc)? List programs affected.   |  | ( )          | ( ) |
| 10. Is Operations Committee review required? (Check "Yes" if criteria 1, 2, or 3 of this checklist are affected)   |  | ( )          | ( ) |
| 11. Is Safety Committee Review Required?   |  | ( )          | ( ) |

SAMPLE

|                        |                          |                                    |
|------------------------|--------------------------|------------------------------------|
| _____<br>Preparer/Date | _____<br>Supervisor/Date | _____<br>Manager, Engineering/Date |
|------------------------|--------------------------|------------------------------------|



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|   |                                    |
|---|------------------------------------|
| EMERGENCY QUALITY DEFICIENCY REPORT<br>CONTINUATION SHEET | EQDR # _____<br>SHEET ____ OF ____ |
| SAMPLE  |                                    |



## MEMORANDUM

NOTIFICATION NO: 41  
DATE: SEPTEMBER 27, 1993

DAEC PROCEDURES ( SERIES) MANUAL NO. 91

| MANUAL CONTENTS              | REMOVE |         | INSERT |         |
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|                              | REV    | DATE    | REV    | DATE    |
| INDEX                        | 40     | 9/20/93 | 41     | 9/27/93 |
| PCN "A" for CPIP 4.3, Rev. 4 | 4      | 7/07/90 | PCN A  | 9/27/93 |

|                                     |  |
|-------------------------------------|--|
| _____ DAEC                          | _____ Engineering Department             |
| _____ Nuclear Licensing             | ___X___ Document Control Resource Center |
| _____ Emergency Planning Department | _____ Nuclear Generation Division        |

NG-013X Rev 6 (106.4)

Signed

Date \_\_\_\_\_

|   |                |
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| 1.2                        | Corporate Notification   | 12          | 12/11/92    |
| 1.3                        | Activation and Operation of the EOF                            | 12          | 12/22/92    |
| 1.4                        | Release of Emergency-Related Information                       | 7           | 02/05/93    |
| 1.5                        | Building Security Implementation                               | 7           | 04/20/93    |
| 1.6                        | Communication and Data Transmission Systems<br>Coordination    | 2           | 07/25/90    |
| 1.7                        | FTS-2000 and Emergency Response Related<br>Communications      | 0           | 11/25/92    |
| 2.1                        | Dose Assessment and Protective Action<br>Recommendations       | 11          | 12/11/92    |
| 2.2                        | Technical Support Coordination                                 | 4           | 01/07/91    |
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| 2.6                        | Legal Assistance   | 2           | 07/20/90    |
| 4.1                        | Maintenance of Emergency Preparedness                          | 9           | 02/05/93    |
| 4.2                        | Training, Drills and Exercises                                 | 6           | 12/20/91    |
| 4.3                        | Deleted - Refer to EPDM 1008.6                                 |             |             |
| 5.1                        | Emergency Response and Recovery Director                       | 5           | 07/19/90    |
| 5.2                        | Radiological and EOF Manager                                   | 10          | 07/08/91    |
| 6.1                        | Recovery and Re-entry  | 0           | 04/01/91    |



# PROCEDURE CHANGE NOTICE

|  |   |  |                     |
|--|---|--|---------------------|
| .. e e<br>ii e e<br>ii e e e e<br>ii e<br>ii e e<br>ii e e | NUCLEAR GENERATION DIVISION<br><hr/> Public Information Program | PROCEDURE NO: CPIP 4.3<br>Rev. No: 4<br>EFFECTIVE DATE: 07/07/90<br>PCN: A<br>EFFECTIVE DATE: 09/27/93 |                     |
| PREPARED BY<br><i>Peggy K. Luman</i>                       | DATE<br><i>9/21/93</i>  | APPROVED BY<br><i>[Signature]</i>  | CONCURRED BY<br>N/A |

## 1.0 PURPOSE

This PCN is being issued to cancel CPIP 4.3, Rev. 4 in its entirety. The content of this procedure is contained in EPDM 1008.6, Rev. 0.

## 2.0 GENERAL

Remove CPIP 4.3, Rev. 4 and insert this PCN in its place.

## 3.0 CHANGES:

CPIP 4.3, Rev. 4 is cancelled by this PCN.



**STOP, CHECK  
AND  
THINK**