

Iowa Electric Light and Power Company

April 25, 1983

NG-83-1415

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. Richard DeYoung
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Response to Notice of Violation of Inspection
Report No. 50-331/83-02 (DE)

Dear Mr. DeYoung:

This letter is submitted pursuant to the requirements of 10CFR2.201 in response to the Notice of Violation issued with NRC Inspection Report No. 50-331/83-02 (DE).

The Notice of Violation states, in part:

. . . the Technical Specification was revised in Amendment 80 without the change being fully described as required. The submittal of the application to amend the Technical Specification did not fully describe the desired changes to Section 6.5.2.6. Consequently, the responsible NRC reviewer was not aware of the change until the time of this inspection. Amendment 80 had been reviewed and approved by the NRC, Division of Licensing, on January 7, 1983.

Response

Explanation of cause:

Iowa Electric has reviewed this violation and determined that it was caused by an administrative error in developing the proposed change. The intent was to remove changes from RTS-134 and incorporate them into another proposed change (RTS-145). Due to an oversight by the personnel developing and reviewing the proposed amendment, RTS-134, the change bars were removed, however, one change which was to be incorporated into RTS-145 was not removed.

8305100372 830504
PDR ADDCK 05000331
Q PDR

Corrective Action Taken and Results Achieved:

As stated in the NRC Inspection Report, the particular change to Section 6.5.2.6 of the Technical Specification was subsequently accepted by the Safety Committee for inclusion in another change (submitted to NRC as proposed change RTS-145).

We would like to clarify that this is not Amendment 81 as stated in the Inspection Report. Proposed changes submitted by Iowa Electric are given designators beginning with either RTS or ETS to indicate changes to either the Radiological or Environmental Technical Specifications. The "Amendment Numbers" are assigned by the NRC to designate amendments issued to the license. These amendments are not necessarily issued in the same sequence as the proposed changes. In this case, RTS-145 is still pending at the NRC and has not been assigned an Amendment Number.

Corrective Action Taken to Avoid Further Noncompliance:

The circumstances surrounding this violation were reviewed and discussed with the personnel involved in developing the change in question.

Additionally, Licensing personnel involved in the development of Technical Specification changes have been cautioned in the necessity for care and accuracy in development and review of these changes.

Date When Full Compliance will be Achieved:

As stated above, in this instance compliance was achieved on December 20, 1982 when RTS-145 was submitted.

Additional Clarification Regarding Inspection Report No. 50-331/83-02 (DE):

In regard to Section C (Audit Program), Paragraph (a) (Results of Review) of the inspection report there was apparently some misunderstanding in regard to our position concerning audit observations.

An audit observation is not an audit finding. An audit observation is not used to report a violation of a requirement. Instead, an audit observation is used to report a concern which, in the opinion of the auditor, warrants attention. Audit observations require no written response on the part of the audited organization. However, some audited organizations routinely respond in writing to audit observations, and these responses are placed in the audit files and are available for future reference.

We hope this clarifies Iowa Electric's position regarding the intent of audit observations.

Page 3
NG-83-1415
April 25, 1983

Please contact this office if there are any comments or questions concerning this response.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/BWR/rh*

cc: B. Reid
L. Liu
S. Tuthill
F. Apicella
J. Keppler
NRC Resident Office
Commitment Control No. 830096