

Iowa Electric Light and Power Company

July 11, 1983

NG-83-2415

Mr. James G. Keppler
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Response to NRC Systematic Assessment of Licensee
Performance

Dear Mr. Keppler:

This letter is submitted in response to Mr. J.A. Hind's letter of June 15, 1983 which transmitted the NRC's draft Systematic Assessment of Licensee Performance (SALP) Report. That letter stated that any comments could be discussed at the meeting on June 21, 1983 and written comments may be submitted within 20 days after the meeting.

We have no comments which were not adequately addressed during the meeting. We would like to express our appreciation for the constructive criticisms presented in this assessment. We believe that significant improvement has been made in the operation of the Duane Arnold Energy Center over the past several months and we intend to continue that improvement in the future. The recommendations of the assessment are valuable in the implementation and administration of our Regulatory Performance improvement Program.

Very truly yours,

R.W. McLaughlin

Richard W. McLaughlin
Manager, Nuclear Division

RWM/BWR/dmh*

cc: B. Reid
L. Liu
S. Tuthill
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NRC Resident Office

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ENCLOSURE 1

Significant SALP Report Findings for the Duane Arnold Energy Center

General

Duane Arnold operations during the evaluation period have continued to improve. There has been significant improvement in four of the ten rated areas. This is attributed to the implementation of an effective Regulatory Performance Improvement Program (RPIP), and increased corporate commitment to plant management and operations. No areas decreased and six areas remained the same. The six areas are still undergoing changes as a result of the RPIP.

The events associated with plant operations, fire protection inspections, and refueling operations indicate that increased attention needs to be directed to upgrading plant procedures and adherence to them.

Surveillance

The licensee's progress in upgrading the pump and valve inservice test program has not been sufficient to meet regulatory requirements. The licensee has submitted a new inservice test program which should alleviate these problems.

Maintenance

The licensee has made significant improvements to ensure maintenance and design change work remains at a high level of competence. Procedural and maintenance staff upgrading have continued and the licensee is rated Category 1 in this area based on their improvements and continued high level of work.

Radiological Controls

The licensee has made significant improvements in the radiation protection program since the SALP 2 assessment. However, quality control of analytical measurements and quality control in the counting room need to be upgraded.

Fire Protection

The licensee has made considerable progress in upgrading the fire protection and housekeeping programs. Increased attention needs to be made in adhering to fire protection procedures. Excellent housekeeping practices helped the licensee to go from a Category 3 to Category 2 in this area.

Licensing Activities

During the assessment period the licensee submitted, on their initiative, a license amendment which was a five year plan for scheduling plant modifications. This plan will assist the licensee in more effectively managing and operating the plant. The program integrates, in a computerized system, the

engineering, procurement and installation of planned NRC retrofit requirements, as well as associated management and training requirements. It also encompasses the licensee's anticipated requirements for plant modifications in the interest of efficiency and reliability as well as maintenance and fuel cycle schedules.

The licensee needs to place more attention on detail and timeliness of reports.

Quality Activities

The licensee has upgraded their committee activities, training, and corrective action programs significantly as a part of their Regulatory Improvement Program. This area is usually not a separately rated area. In future SALP's, it will not be rated if the licensee continues to show acceptable performance.

Regulatory Improvement Program

During this assessment period, NRC findings and observations indicated a need for improvement in communications, management and supervisory involvement, procedures, safety committee activities, training, and corrective action programs.

These findings were presented to the licensee on May 19, 1982, and June 4, 1982. On September 13, 1982, the licensee submitted an acceptable plan to the NRC covering the above areas and licensee plans and milestones for upgrading them.

The licensee's plan has been very effective and the licensee has performed it enthusiastically and continued to evaluate and upgrade it as necessary. The licensee has met or exceeded his commitments in all areas. The corporate commitment to plant operations is very apparent. As a result of this plan, the licensee has made significant progress in upgrading overall plant performance since the last appraisal.