



UTILITIES

November 14, 1995

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John F. Franz, Jr.
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NG-95-2716

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No. 50-331
Operating License DPR-49
Reporting of Changes to the Quality Assurance Program
Description, UFSAR 17.2

Reference: 1) NRC Letter (Mark Ring) of March 10, 1995, to Lee Liu of IES
Utilities Inc.
2) IES Utilities Inc. Letter of December 5, 1994 (NG-94-4459),
John F. Franz, Jr. to Bill Russell

File: A-116, A-365, Q-98

Dear Mr. Russell:

This letter transmits the latest revision (16) of the Quality Assurance Program Description (QAPD) for the Duane Arnold Energy Center in accordance with the requirements of 10 CFR Sections 50.54(a)(3) and 50.71(e).

This submittal includes the following changes, none of which is a reduction in commitment:

- Transfer responsibility for the inspection program from the Quality Assurance Department to the Maintenance Department.
- Change the title of the "Plant Superintendent" to "Plant Manager, Nuclear".
- Clarify indoctrination and training program responsibilities.
- Remove the listing of documents subject to document control.
- Establish clearly that SNT-TC-1A is the basis for performance of non-destructive testing.
- Clarify responsibilities for implementation of the nonconformance program.
- Recognize the Vice President, Nuclear as the only officer responsible to fulfill the provisions of 10 CFR Part 21 for reporting of defects and non-compliances.

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- Separately identify Quality Assurance audits performed under the cognizance of the Safety Committee.
- Establish a frequency of 24 months for Quality Assurance audits unless otherwise required by regulation.
- Remove the unnecessary term "consistent with DAEC Technical Specifications" from the discussion of authority for temporary changes to procedures.
- Move toward a peer inspection program and adoption of Regulatory Guide 1.8, Revision 1-R, May 1977 and ANSI/ANS 3.1 - 1978 for the basis of qualification.
- Remove the unnecessary elaboration regarding the qualifications of personnel who approve preoperations, startup, and operation test procedures and test results and who direct or supervise the conduct of individual preoperational, startup, and operational tests.

Attachment 1 to this submittal is the QAPD, UFSAR Section 17.2 and Appendix A thereto (Revision 16). Changes are identified by revision bars in the margin.

Attachment 2 to this submittal discusses the changes in the QAPD and the reasons for the changes, and states the bases for concluding that the program continues to satisfy the criteria of 10 CFR Part 50, Appendix B.

Very truly yours,



John F. Franz

Vice President, Nuclear

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JJF/KEP/JG/hjf

- Attachments: 1) UFSAR/DAEC-1, Chapter 17.2, Revision 16, Date to be determined.
- 2) Discussion of Changes in the Quality Assurance Program Description.

cc: K. Peveier
B. Fisher
H. Miller, (NRC - Region III)
G. Kelly (NRC - NRR)
NRC Resident Office
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