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John F. Franz, Jr.
Vice President, Nuclear

April 4, 1997
NG-97-0571

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D.C. 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to a Notice of Violation Transmitted with Inspection Report 97002
File: A-105, A-102

Dear Sir:

This letter and attachment are provided in response to the Notice of Violation transmitted with NRC Inspection Report 97002.

This letter contains no new commitments.

If you have any questions regarding this matter, please contact my office.

Sincerely,

John F. Franz
Vice President, Nuclear

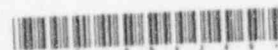
Attachment: Reply to a Notice of Violation Transmitted with Inspection Report 97002.

cc: R. Murrell
L. Root
G. Kelly (NRC-NRR)
A. B. Beach (Region III)
NRC Resident Office
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**IES Utilities Inc.
Reply to a Notice of Violation
Transmitted with Inspection Report 97002**

VIOLATION

Technical specification 6.9.1 requires procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Administrative Control Procedure 1411.27, Revision 0, "Rules For Conduct of Work in Radiological Areas," dated December 8, 1995, Step 3.5 (1) requires that workers obey posted, oral, and written radiological control instructions, procedures, and radiation work permits including "stop work" and "evacuate" orders from health physics personnel.

Radiation Work Permit 18, Job Step 3, dated February 10, 1997, states that prior to beginning work, health physics shall be informed if a contaminated system will be opened.

Contrary to the above, on February 10, 1997, licensee personnel failed to inform health physics personnel prior to opening a contaminated system. Specifically, mechanical maintenance personnel failed to contact health physics prior to lifting the dome head on a condensate demineralizer which was a contaminated system.

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

RESPONSE TO VIOLATION

1. REASON FOR THE VIOLATION

On February 10, 1997, during work on the 1T013C condensate demineralizer, workers failed to notify health physics when they lifted the demineralizer dome head. This notification (opening a contaminated system) was required by Radiation Work Permit 18, Job Step 3. Less than adequate communication at the pre-job briefing and a lack of understanding of the radiation work permit requirements contributed to the failure to notify health physics personnel.

2. CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

A fact finding meeting was held on February 10, 1997 to understand the event and Action Request 97-0144 was initiated as part of the corrective action program.

Corrective actions for this event include:

- ☐ Radiation Work Permit 18, Job Step 3 was revised to be more explicit in the "Notes to the Worker" section regarding which activities require health physics notification and involvement. Specifically, the following "hold points" were added: "1) O2 sample and confined space permit prior to entering pit, 2) HP to be present when lifting dome head, 3) HP to be present when lifting out tube sheet." This action was completed February 11, 1997.
- ☐ Equipment-Specific Maintenance Procedure DEMIN-D055-01, "DEVAL, Condensate Demineralizer Tank, Filter Element Cleaning," was revised to include specific notes and instructions to the workers on when to contact health physics and how to help control the contamination encountered during the disassembly of the vessel. This action was completed February 17, 1997.
- ☐ The Mechanical Maintenance Supervisor has reinforced with the Mechanical Maintenance Department his expectations for communicating the details of their planned work with health physics personnel. Specifically, they are to explain each step of their job in detail such that there can be no misunderstanding of when health physics involvement is necessary.
- ☐ The Health Physics Supervisor has discussed this event with the Health Physics Department to reinforce the importance of detailed and timely communication of work activities. In addition, Training Material Action Request TM97-0112 was initiated to include this event in health physics initial and continuing training for additional reinforcement.
- ☐ Although initiated prior to this event, meetings will continue between the Health Physics and Mechanical Maintenance Departments to continue looking for opportunities for improved communication and work control.

3. **CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

All corrective actions to prevent further violations have been completed.

4. **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance was achieved on February 10, 1997 via the identification of the problem and issuance of Action Request 97-0144.