July 1, 2005

Mr. Gary Van Middlesworth
Site Vice-President
Duane Arnold Energy Center
Nuclear Management Company, LLC
3277 DAEC Road
Palo, IA 52324

SUBJECT: DUANE ARNOLD ENERGY CENTER
NRC INSPECTION REPORT 5000331/2005011 AND NOTICE OF VIOLATION

Dear Mr. Van Middlesworth:

On June 3, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the Duane Arnold Energy Center. The enclosed inspection report documents the inspection findings which were discussed on June 03, 2005, with Mr. J. Bjorseth and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The purpose of this inspection was to assess the safety significance and any necessary regulatory actions associated with the primary system hydrostatic test, VT- 2 inspections, and control rod testing activities that occurred at Duane Arnold on April 26 and 27, 2005. Within these areas, the inspection consisted of interviews with personnel and the selected examination of procedures and representative records.

Based upon the results of this inspection, the NRC identified two issues that were evaluated under the risk significance determination process as having very low safety significance (green). The NRC determined that violations were associated with each of the two issues. One of the issues was also evaluated in accordance with the NRC Enforcement Policy and was determined to be a Severity Level IV violation of NRC requirements. The current Enforcement Policy is included on the NRC's Web site as www.nrc.gov; select **What We Do, Enforcement** and **Enforcement Policy**. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the violations are described in detail in the subject inspection report. The violations are being cited in the enclosed Notice because you failed to restore compliance within a reasonable time period after the violations were identified and you failed to enter the issues into your corrective action program to address recurrence. The violations involved your failure to comply with the requirements of Technical Specification 3.10.1, "System Leakage and Hydrostatic Testing," and 10 CFR 50.59, "Changes, Tests, and Experiments."

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with

regulatory requirements. During the discussion of the violations at the exit, your staff indicated that they did not agree with the violations, and would include the basis for the disagreement in the response to our Notice of Violation.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures and your response will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Mark A. Satorius, Director
Division of Reactor Projects

Docket No. 50-331
License No. DPR-49

Enclosures: Inspection Report 5000331/2005011
w/Attachment: Supplemental Information
Notice of Violation

cc w/encl: E. Protsch, Executive Vice President -
Energy Delivery, Alliant;
President, IES Utilities, Inc.
C. Anderson, Senior Vice President, Group Operations
J. Cowan, Executive Vice President and Chief Nuclear Officer
J. Bjorseth, Site Director
D. Curtland, Plant Manager
S. Catron, Manager, Regulatory Affairs
J. Rogoff, Vice President, Counsel, & Secretary
B. Lacy, Nuclear Asset Manager
Chairman, Linn County Board of Supervisors
Chairperson, Iowa Utilities Board
The Honorable Charles W. Larson, Jr.
Iowa State Senator
D. McGhee - Department of Public Health

DOCUMENT NAME: G:\DUAN\DAEC Inspection Report 2005-011.wpd

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NOTICE OF VIOLATION

Nuclear Management Company, LLC
Duane Arnold Energy Center

Docket No. 50-331
License No. DPR-49

During an NRC inspection conducted from April 25 through June 03, 2005, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy the violations are listed below:

I. Technical Specification (TS) 3.10.1, Special Operations, "System Leakage and Hydrostatic Testing," allows exemptions of Mode requirements for the performance of primary system leakage and hydrostatic testing. The exemptions allow the plant to operate above 212°F in the reactor coolant system and still be considered in Mode 4, even though the associated temperature would be Mode 3 with the following exceptions: Secondary Containment Isolation Instrumentation, Secondary Containment, Secondary Containment Isolation Valves/Dampers, and Standby Gas Treatment System requirements.

Contrary to this requirement, on April 26, 2005, after completion of the reactor coolant system hydrostatic test and code required Visual Test (VT) - 2 inspections, the licensee violated the requirements of TS 3.10.1 by remaining above 212°F, an unplanned transition from Mode 4 to Mode 3, while conducting control rod scram time testing and without completing all of the Mode 3 TS requirements. The noncompliance of TS 3.10.1 continued through April 27, 2005, when control rod scram time testing was completed and a reactor coolant system cooldown commenced.

This is a violation associated with a Green finding.

II. 10 CFR 50.59, "Changes, tests, and experiments," states, in part, the holder of a license authorizing operation of a production or utilization facility may conduct tests not described in the safety analysis report, without prior Commission approval, unless the proposed test involves a change in the technical specifications incorporated in the license.

Contrary to the above, on August 19, 1999, the licensee authorized the conduct of a test of the control rod scram system with the plant in Mode 4, a test not described in the safety analysis report and requiring a change to the Technical Specifications incorporated into the license, without prior Commission approval. Specifically, the licensee approved changes to Surveillance Test Procedures (STPs) 3.10.1.01, "Non-nuclear Heat Class 1 System leakage Pressure Tests," and 3.10.1.02, "Non-Nuclear Heat Class 1 Ten year System Leakage Pressure Test," which authorized licensed operators to hold the reactor coolant system pressure at 850 to 950 pounds per square inch gauge (psig), following the completion of the reactor coolant system hydrostatic test and the Visual Test-2 inspections, in order to conduct control rod scram time testing, an activity not authorized under the special conditions of Technical Specification 3.10.1. Technical Specification 3.10.1 allowed the licensee to heat up [raise the pressure] of the reactor coolant system to Mode 3 conditions [greater than 212°F], without meeting the

requirements specified in other Technical Specifications for entry into Mode 3, for the limited purpose of conducting reactor coolant system leakage and hydrostatic testing.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Nuclear Management Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the Duane Arnold Energy Center, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation"; and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated this 1st day of July, 2005

Enclosure

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-331
License No:	DPR-49
Report No:	05000331/2005011
Licensee:	Nuclear Management Company, LLC
Facility:	Duane Arnold Energy Center
Location:	3277 DAEC Road Palo, Iowa 52324-9785
Dates:	April 25, 2005 through June 03, 2005
Inspectors:	G. Wilson, Senior Resident Inspector R. Baker, Resident Inspector
Approved by:	Bruce L. Burgess, Chief Branch 2 Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000331/2005000; 04/25/2005 - 06/03/2005; Duane Arnold Energy Center, Outage Activities.

The report covered inspection activities on issues associated with Non-Nuclear Heat Class 1 System Leakage Pressure Tests. The inspections were conducted by the resident inspectors. The inspection identified a TS 3.10.1 violation associated with a Green finding and one Severity Level IV violation. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be "Green" or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

Cornerstone: Mitigating Systems

- Green. The inspectors identified that the licensee was not in compliance with Technical Specification 3.10.1, "System Leakage and Hydrostatic Testing Operation." The non-compliance occurred when the licensee remained above 212°F to performed SCRAM time testing after completion of the reactor coolant system hydrostatic testing and required VT- 2 leakage inspections on April 26 and 27, 2005. Therefore, the operating exemptions allowed by TS 3.10.1 for the system leakage tests would not be applicable.

  Because the issue was not entered into your corrective action program and you did not restore compliance within a reasonable period of time, a Notice of Violation is being issued. The finding was determined to be of very low safety significance since the procedure was performed at the end of an outage, when the decay heat rate was very low, and multiple trains of emergency core cooling systems were available for accident purposes. This was determined to be a TS 3.10.1 violation associated with a Green finding. (Section 1R20)

- Green. The inspectors identified that a change to the procedures for the Non-Nuclear Heat Class 1 System Leakage Pressure Tests required prior NRC approval. The procedural changes lengthened the amount of time that the reactor coolant system would exceed 212°F, an unplanned mode change, and added control rod drive scram time testing. These procedural changes resulted in a need for a change in the Technical Specifications (TS) 3.10.1, "System Leakage and Hydrostatic Testing Operation."

  The finding involved a violation of 10 CFR 50.59, an activity that may impact the regulatory process. Therefore, the finding was evaluated in accordance with the traditional enforcement process. Because the finding was not entered into your corrective action program and you did not restore compliance within a reasonable period of time, a Notice of Violation is being issued. The finding was

determined to be of very low safety significance since the System Leakage Test was performed at the end of the refueling outage when the decay heat rate was very low and multiple trains of emergency core cooling systems were available for accident purposes. This finding was determined to be a Severity Level IV violation of 10 CFR 50.59. (Section 1R20)

B. Licensee-Identified Violations

No findings of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Initiating Events, Mitigating Systems, and Barrier Integrity

1R20 Outage Activities (71111.20)

.1 Refueling Outage

a. Inspection Scope

The inspectors observed outage activities for Scheduled Refueling Outage Number 19 during this inspection period. Outage configuration management was monitored by verifying that the licensee maintained appropriate defense in depth to address all shutdown safety functions and satisfy Technical Specification (TS) requirements. The documents listed in the Attachment were used to accomplish the objectives of the inspection procedure. This inspection will not count as an annual sample.

b. Findings

1. Technical Specification 3.10.1 Compliance

Introduction: The inspectors identified that the licensee failed to comply with TS 3.10.1 "System Leakage and Hydrostatic Testing Operation," requirements. The issue was considered to be of very low safety significance (Green).

Description: On April 26, 2005, the inspectors identified that the licensee was not in compliance with Special Operations TS 3.10.1, "System Leakage and Hydrostatic Testing Operation." The non-compliance was due to the failure to cool down the plant following completion of the reactor coolant system hydro and VT- 2 inspections. The licensee extended the operation of the plant with temperatures greater than 212°F to perform SCRAM time testing, which was completed on April 27, 2005. The inspectors questioned the licensee's compliance with TS 3.10.1, since the operating exemptions for plant operation only apply for system leakage and hydrostatic testing, therefore the exemptions are not applicable for SCRAM time testing. Because SCRAM time testing was performed after the leakage inspections were complete, the operating exemptions allowed by TS 3.10.1 for system leakage tests would not be applicable. During the extension of the time that the plant was greater than 212°F for SCRAM time testing, the plant would be considered to be in Mode 3 without having all the requirements necessary for Mode 3 operation. The inspectors first questioned the licensee's TS compliance on April 26, 2005 during a discussion with the Operations Shift Manager. Additional discussions with the licensee occurred on April 27, 2005, and involved the Site Director, Plant Manager, and the Regulatory Affairs Manager. Even though the inspectors challenged the compliance with TS 3.10.1, the licensee continued to perform SCRAM time testing until it was completed and then commenced a plant cool down. No actions were performed to resolve the non-compliance. Upon further evaluation, the inspectors identified that the licensee had also violated the requirements of TS 3.10.1 to perform SCRAM time testing during the Class 1 System Leakage Pressure Test for the

following periods: November 23, 1999, through November 25, 1999, May 18, 2001, through May 21, 2001, and April 15, 2003, through April 16, 2003.

Analysis: Using IMC 0612, "Power Reactor Inspection Reports," the inspectors determined that the failure to comply with TS 3.10.1 was a failure to meet a requirement and was reasonably in the licensee's ability to foresee, therefore it was a performance deficiency. Since a performance deficiency existed, the inspectors reviewed this issue against the guidance contained in Appendix B, "Issue Dispositioning Screening," of IMC 0612. In particular, the inspectors compared this finding to the findings identified in Appendix E, "Examples of Minor Issues," of IMC 0612 to determine if the finding was more than minor. Following that review, the inspectors concluded that the guidance in Appendix E was not applicable for the specific finding. As a result, the inspectors compared this performance deficiency to the minor questions contained in Appendix B of IMC 0612. The inspectors determined that the issue was more than minor because the condition could be reasonably viewed as a precursor to a significant event. The precursor to a significant event was based on the fact that the Mode of plant operation was changed without having met all the necessary requirements for the operability of emergency core cooling systems (ECCS).

As a result, the inspectors reviewed this issue in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations." The inspectors determined that the issue could not be evaluated using the operating plant SDP because the plant was in a shutdown condition. Therefore the inspectors evaluated the issue utilizing the associated plant condition and available mitigating equipment. Since the issue occurred at the end of the refueling outage, the resultant decay heat load of the fuel was very low. In addition, multiple trains of emergency core cooling systems were available for accident purposes, therefore the issue was of very low safety significance (Green).

Enforcement: Special Operations TS 3.10.1, "System Leakage and Hydrostatic Testing," allows exemptions of reactor coolant temperature requirements for the performance of system leakage and hydrostatic testing. The exemptions allows the plant to go above 212°F and still be considered in Mode 4 even though the associated temperature would be Mode 3 for system leakage tests. Contrary to this requirement, the licensee extended the plant operation time with reactor coolant temperature greater than 212°F from April 26 through April 27, 2005, to perform SCRAM time testing following the completion of the VT- 2 inspections for the systems leakage test. Furthermore, the licensee failed to restore compliance within a reasonable period of time after the issue was identified to your staff on April 26, 2005. In addition, the licensee also failed to comply with the requirements of TS 3.10.1 during the following periods: November 23, 1999, through November 25,1999, May 18, 2001, through May 21, 2001, and April 15, 2003, through April 16, 2003. The failure to comply with the requirements of TS 3.10.1 was a violation. Since the licensee failed to restore compliance within a reasonable time after the violation was identified and they did not place the violation into a corrective action program to prevent recurrence, a Notice of Violation (NOV) is being issued for this violation associated with a Green finding, consistent with Section VI.A.1 of the NRC Enforcement Policy. (NOV 05000331/2005011-01)

2. Procedures Changes for Non-Nuclear Heat Class 1 System Leakage Pressure Tests

Introduction: The inspectors identified that the licensee failed to obtain prior NRC approval in accordance with 10 CFR 50.59, "Changes, tests, and experiments," for a change to the Procedures for Non-Nuclear Heat Class 1 System Leakage Pressure Tests. The issue was considered to be of very low safety significance (Green) and was dispositioned as a Severity Level IV violation.

Description: On April 27, 2005, the inspectors identified that an inadequate 10 CFR 50.59 screening was performed in 1999 for the procedure changes associated with the Surveillance Test Procedure (STP) 3.10.1.01, "Non-Nuclear Heat Class 1 System Leakage Pressure Tests," and STP 3.10.1-02, "Non-Nuclear Heat Class 1 Ten Year System Leakage Pressure Test." The licensee performed the 50.59 screening on August 19, 1999, for the procedure changes that were made to STP 3.10.1.01 and STP 3.10.1-02. In that screening, the licensee stated the procedure change did not require a change to the Technical Specifications. Part of the procedure changes associated with the 50.59 screening added steps to hold the reactor pressure at 850-950 pounds per square inch gauge (psig) after the completion of the reactor system hydrostatic test and the Visual Test (VT) - 2 inspections to allow performance of SCRAM time testing. The inspectors questioned the licensee's 50.59 screening conclusions since Special Operations TS 3.10.1, "System Leakage and Hydrostatic Testing Operation," conditions for operation only apply for system leakage and hydrostatic testing, so the operating exemptions that are given for plant operation greater than 212°F are only applicable for the completion of the leakage inspections and associated plant cooldown. Since the change added SCRAM time testing after the leakage inspections were complete, the operating exemptions allowed by TS 3.10.1 for System Leakage tests would not be applicable. Therefore, during the extension of the time that the plant was greater than 212°F, which is Mode 3, for SCRAM time testing, the plant would be considered to be in Mode 3 without having all the requirements necessary for Mode 3 operation. The procedure change resulted in a need for a change of TS 3.10.1 to allow the procedure to be performed as written, therefore, in accordance with 10 CFR 50.59, the licensee needed to obtain NRC approval prior to implementing the procedure change.

Analysis: The violation identified above has existed since 1999, involved an inadequate 10 CFR 50.59 evaluation, and impacted the NRC regulatory process. Therefore this violation is being dispositioned using the traditional enforcement process instead of the significance determination process (SDP). Typically, the Severity Level would be assigned after consideration of appropriate factors for the particular regulatory process violation in accordance with the NRC Enforcement Policy. However, the SDP is also used, if applicable, in order to consider the associated risk significance of the finding prior to assigning a severity level.

Using Inspection Manual Chapter (IMC) 0612, "Power Reactor Inspection Reports," the inspectors determined that the failure to perform an adequate 50.59 screening evaluation for the procedure changes associated with STP 3.10.1-01 and STP 3.10.1-02 was a failure to meet a requirement and standard therefore it was a performance deficiency. Since a performance deficiency existed, the inspectors reviewed this issue against the guidance contained in Appendix B, "Issue Dispositioning Screening," of IMC 0612. In particular, the inspectors compared this finding to the findings identified in Appendix E, "Examples of Minor Issues," of IMC 0612 to determine whether the finding was minor. Following that review, the inspectors concluded that the guidance in Appendix E was not

applicable for the specific finding. As a result, the inspectors compared this performance deficiency to the minor questions contained in Appendix B of IMC 0612. The inspectors determined that the issue was more than minor because the condition could be reasonably viewed as a precursor to a significant event. The precursor to a significant event was based on the fact that the Mode of plant operation was changed without having met all the necessary requirements for the operability of emergency core cooling systems.

As a result, the inspectors reviewed this issue in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations." The inspectors determined that the issue could not be evaluated by the associated SDP. Therefore the inspectors evaluated the issue utilizing the associated plant condition and available mitigating equipment. Since the issue occurred at the end of the refueling outage, the resultant decay heat load of the fuel was very low. In addition, multiple trains of emergency core cooling systems were available for accident purposes, therefore the issue was of considered to have very low safety significance (Green).

Enforcement: 10 CFR 50.59, "Changes, tests, and experiments," states, in part, the holder of a license authorizing operation of a production or utilization facility may conduct tests not described in the safety analysis report, without prior Commission approval, unless the proposed test involves a change in the technical specifications incorporated in the license. Contrary to this, on August 19, 1999, the licensee implemented a change to STP 3.10.1.01 and STP 3.10.1-02 which resulted in the need for a change in the TS. The result of the violation was determined to be of very low safety significance; therefore, this violation of 10 CFR 50.59 was classified as a Severity Level IV violation. Since the licensee failed to restore compliance within a reasonable time after the violation was identified and they did not place the violation into a corrective action program to prevent recurrence, a Notice of Violation (NOV) is being issued for this Severity Level IV violation, consistent with Section VI.A.1 of the NRC Enforcement Policy.
(NOV 05000331/2005011-02)

4OA6 Meetings

1. Exit Meeting

The inspectors presented the inspection results to Mr. J. Bjorseth and other members of licensee management on June 03, 2005. During the discussion of the violations at the exit, your staff indicated that they did not agree with the violations, and would include the basis for the disagreement in the response to our Notice of Violation. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee
G. Van Middlesworth, Site Vice President
J. Bjorseth, Site Director
S. Catron, Regulatory Affairs Manager
D. Curtland, Plant Manager
G. Rushworth, Operations Manager

Nuclear Regulatory Commission

B. Burgess, Chief, Division of Reactor Projects, Branch 2

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000331/2005011-01	NOV	Failure to Comply with the Requirements of TS 3.10.1 during the Performance of the Non-Nuclear Heat Class 1 System Leakage Pressure Test
05000331/2005011-02	NOV	Failure to Comply with the Requirements of 10 CFR 50.59 for a Change to the Procedures for Non-Nuclear Heat Class 1 System Leakage Pressure Tests

Closed

None.

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1R20 Outage Activities

Planned Outage Look Ahead Report, March 4, 2005
Planned Outage Risk Analysis, February 17, 2005
Integrated Plant Operating Instruction (IPOI) 1, Startup Checklist, Revision 90
IPOI 2, Startup, Revision 75
IPOI 3, Power Operations, Revision 61
IPOI 8, Outage and Refueling Operations, Revision 30
Operating Instruction (OI) 149, RHR System, Revision 81
Outage Management Guidelines, Outage Risk Management Guidelines, Revision 11
STP 3.10.1-02, Non-Nuclear Heat Class 1 Ten Year System Leakage Pressure Test, Revision 11
STP 3.10.4-01, SCRAM Insertion Time Test, Revision 15

LIST OF ACRONYMS USED

ADAMS	Agency Wide Document Access and Management System
AOT	Allowed Outage Time
CFR	Code of Federal Regulations
ECCS	Emergency Core Cooling Systems
F	Fahrenheit
IMC	Inspection Manual Chapter
IPOI	Integrated Plant Operating Instruction
NOV	Notice Of Violation
NRC	Nuclear Regulatory Commission
OI	Operating Instruction
PARS	Publicly Available Records
PSIG	Pounds Per Square Inch Gauge
SDP	Significance Determination Process
STP	Surveillance Test Procedure
TS	Technical Specification
VT	Visual Test