

Iowa Electric Light and Power Company

June 7, 1985
NG-85-2813

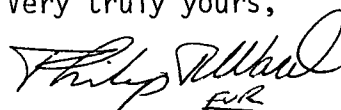
Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center
Docket No. 50-331
Op. License DPR-49
Response to NRC Inspection Report 85-10

Dear Mr. Keppler:

This letter is provided in response to the subject inspection of Duane Arnold Energy Center activities on April 15-19, 1985. Attachment A provides our response in accordance with your request.

Very truly yours,



Richard W. McGaughey
Manager, Nuclear Division

RWM/WRK/kp

Attachments: Response to IR 85-10
Status of Data Noted in Inspection Report 85-10

cc: W. Keith
L. Liu
S. Tuthill
M. Thadani
NRC Resident Inspector
Commitment Control 850142
File: A-102, NRC-4

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Response to IR 85-10

Attachment A

NRC Item of Violation (Severity V)

Duane Arnold Energy Center Technical Specification 6.8.1 requires that written procedures shall be prepared, approved, implemented and maintained for preventive and corrective maintenance operations which could have an effect on nuclear safety.

Contrary to these requirements, the licensee failed to implement Repair Procedure RP83/ie-9 in that certain data recording requirements were not completed.

Response to Item of Violation

1. Corrective Action Taken and the Results Achieved

Of the data noted in the Inspection Report, a portion of the data was not required by the repair procedure in effect at that time and other data was not recorded as required. The latter data has been retrieved except for that data which requires disassembly of the used valve internals (which were replaced with new internals) and two measurements which were inaccessible due to earlier MSIV reassembly. The two measurements on installed MSIVs are of interest only for historic data collection purposes and exceed manufacturer recommendations. The used valve data will be collected at a later date (these valve internals are removed from service). See Attachment B for additional detail.

Data requirement discrepancies noted in the Inspection Report involved data collection attachments added to the repair procedure by Iowa Electric several years prior to procuring a Rockwell machining tool for use in valve seat machining. This data was not included in that recommended by the valve manufacturer.* At present, this data is collected for historical purposes to aid in our continuing efforts to diagnose leakage trends.

*Because the Rockwell tool is self-aligning, use of the tool provides a satisfactory seat without the use of this data as demonstrated by virtually zero as-left LLRT leakage.

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Iowa Electric is currently reviewing these data requirements to determine which requirements provide significant benefits in improved valve performance history and leakage diagnosis. All data requirements not providing these benefits are being procedurally deleted. This review will be completed and any measuring tools needed will be acquired before the affected procedures are next utilized.

After the inspection, meetings were held with all electrical and mechanical maintenance personnel to emphasize the importance of following procedural requirements. Also, the requirement of preparer and verifier signature has been added for data collected during this outage, as noted in the Inspection Report, and for future valve maintenance using this procedure. The addition of this requirement will provide assurance that future data collection will be in accordance with the procedure.

2. Corrective Action to Be Taken to Avoid Further Noncompliance

- 1) As noted above the repair procedure is being reviewed to determine what data is required and other data requirements will be deleted. The revision of the procedure will include signatures for the individuals performing the inspection and verifying the data and will be completed by August 30, 1985. The repair procedure will not be utilized prior to this revision.

3. Date When Full Compliance Will be Achieved

All data which has been evaluated to be significant to valve operation has been collected. Revisions to the procedure which remove unwarranted data requirements will be completed by August 30, 1985, thus achieving full compliance.

Attachment B

Status of Data Noted in Inspection Report 85-10

Listed below is the data specified by RP83/ie-9, Maintenance of a Modified MSIV, but not recorded for the outboard MSIVs at the time of the NRC inspection. The attachments discussed below refer to Repair Procedure attachments as referenced in the Inspection Report.

1. Condition of valve seat prior to repair (Attachment 4)
2. 3 of 5 valve body inside diameter measurements (Attachment 5, dimensions C, D, E)
3. Total indicated runout (TIR) at 2 upper valve body locations, seat, and lower reference bore (Attachment 6, dimensions A, B, C, D)
4. Diameter of new valve stem (Attachment 8)
5. TIR of old valve stem (Attachment 8)

As noted in the Inspection Report, measuring equipment was not available to take the measurements described in Item 2 above and dimensions A and B described in Item 3 above. During a meeting of plant Maintenance and Quality Control personnel prior to valve maintenance, an evaluation was performed concerning the necessity of taking this data. It was determined that this data was for historical, not operational purposes. A procedure change (Document Change Form) was issued prior to the inspection period to delete the requirement for these measurements. Therefore, personnel properly complied with procedures concerning Item 2 and dimensions A and B in Item 3.

The valve body lower reference bore TIR (Attachment 6, dimension D) was previously used to improve the angle and concentricity of the valve seat during machining. A Rockwell machining tool has since been acquired which is self-centering and provides a satisfactory seat without the use of this data. For this reason, the data was not collected on the outboard valves. As the valves had been reassembled and the need for the data is not considered great enough to warrant disassembly, it has not been collected.

The new stem diameter above the backseat has been recorded. The stem below the backseat is inaccessible and this diameter has not been recorded. The measurements of the lower diameter are considered to be of minimal value as this area of the stem does not contact other valve internals.

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The remaining data (Attachment 4, dimension C of Attachment 6, and TIR of old stem from Attachment 8) has been retrieved from other records or the valve internals removed during this outage with the following exception. The pilot seat inspection of Item 1 above and TIR of the old stem (Item 5) require disassembly of the removed valve internals. As this is only historical data on valve internals which were replaced, the disassembly will be completed after the present outage.

Following the NRC inspection, maintenance was completed on the inboard MSIVs. All repair procedure data has been collected with the following exceptions:

- 1) Pilot stem inspection and old stem TIR which will be completed upon disassembly of the removed valve internals following this outage. (Item 1 and 5 above)
- 2) Three of 5 valve body inside diameter measurements and valve body TIR at 2 locations for which no measuring equipment was available. Note that a procedure change (Document Change Form) was in effect deleting this requirement. (Same as Item 2 and dimension A, B of Item 3 above)
- 3) New stem diameter below the backseat due to previous valve internals assembly. (Same as Item 4 above)