

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9103010007      DOC. DATE: 91/02/14      NOTARIZED: NO      DOCKET #  
 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow      05000331  
 AUTH. NAME      AUTHOR AFFILIATION  
 MINECK, D.L.      Iowa Electric Light & Power Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 DAVIS, A.B.      Region 3 (Post 820201)

SUBJECT: Responds to violations noted in Insp Rept 50-331/90-23.  
 Corrective actions: clear guidance developed on acceptable  
 methods for electrically deactivating valves & inboard  
 torus vent isolation valve deactivated on 901205.

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Iowa Electric Light and Power Company

DEO

February 14, 1991  
NG-91-0322

✓ Mr. A. Bert Davis  
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 Notice of Violation  
Transmitted with NRC Inspection  
Report 90023

File: A-102, A-103

Dear Mr. Davis:

This letter and attachment are provided in response to the Notice of Violation concerning certain activities at the Duane Arnold Energy Center.

If you have any questions regarding this response, please feel free to contact our office.

Very truly yours,

*[Signature]*  
Daniel L. Mineck  
Manager, Nuclear Division

DLM/JP/pwj

Attachment: 1) Response to Notice of Violation

cc: U. S. NRC Document Control Desk (Original)  
L. Liu  
L. Root  
R. McGaughy  
S. P. Sands (NRR)  
NRC Resident Inspector - DAEC

IEO 1  
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Iowa Electric Light and Power Company  
Response to Notice of Violation  
Transmitted with Inspection Report 90-023

NRC NOTICE OF VIOLATION

"Technical Specification (TS) 3.7.D.2 states with one or more of the primary containment isolation valves shown in Table 3.7.3 inoperable, maintain at least one isolation valve operable or isolated and within 4 hours either: a. restore the inoperable valve to operable status, or b. isolate each affected penetration by use of at least one automatic valve locked or electrically deactivated in the isolated position.

Contrary to the above, the licensee failed to either lock or electrically deactivate the Inboard Torus Vent Isolation Valve, CV-4300, on November 29, 1990, when the Outboard Torus Vent Isolation Valve, CV-4301 was declared inoperable. This condition remained from 4:30 p.m. (CST) on November 29, 1990, until 10:24 a.m. (CST) on December 5, 1990, at which time a temporary modification was performed to electrically deactivate valve CV-4300 in the isolated position.

This is a Severity Level IV Violation (Supplement 1)."

RESPONSE TO NOTICE OF VIOLATION

1. Corrective Action Taken and the Results Achieved

CV4300 is a normally-closed valve. It is held open by pneumatic pressure against the force of a spring. The pneumatic air supply is controlled by a solenoid valve. When electrically de-energized, this solenoid valve is closed, isolating the pneumatic pressure to CV4300. The spring then holds CV4300 shut. On November 29, 1990, when CV4301 was declared inoperable, Technical Specification 3.7.D.2 was reviewed and steps taken in response to its requirements. These steps included placing the handswitch of CV4300 in the "close" position. This action electrically de-energized the solenoid valve controlling CV4300's pneumatic air supply. The handswitch for CV4300 was administratively labeled with a Warning Tag to provide notice the valve was closed to satisfy Technical Specification requirements.

The NRC Site Resident Inspector advised on December 5, 1990, that the current status of CV4300 did not meet the requirements of Technical Specification 3.7.D.2. CV4300 was then electrically deactivated in the isolated position by lifting the power lead to its controlling solenoid valve.

As a corrective action to prevent recurrence, we have developed clear guidance on the acceptable methods for electrically deactivating valves in order to satisfy the Technical Specification Table 3.7.D.2 requirements. This guidance is now in effect. A review of the Technical Specifications for similar requirements pertaining to electrical deactivation found no additional guidance was necessary.

2. Corrective Action to be Taken to Prevent Recurrence

All corrective actions to prevent recurrence have been completed.

3. Date When Full Compliance was Achieved

Full compliance was achieved on December 5, 1990, when the Inboard Torus Vent Isolation Valve, CV-4300, was electrically deactivated by lifting the power lead to its controlling solenoid valve.