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 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 50-331/91-16.
 Corrective actions: PORV successfully stroke tested on
 910930, guidance for post-maint testing documentation
 implemented & valve positions verified open.

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Iowa Electric Light and Power Company

December 20, 1991
NG-91-4079

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 91016

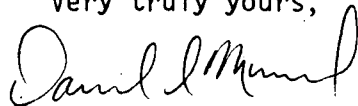
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Dear Mr. Davis:

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,



Daniel L. Mineck
Manager, Nuclear Division

DLM/SC/pwj

Attachment: 1) Response to Notice of Violation

cc: U. S. NRC Document Control Desk (Original)
L. Liu
L. Root
R. McGaughy
C. Shiraki (NRR)
NRC Resident Inspector - DAEC
Commitment Control No. 910227

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Iowa Electric Light and Power Company
Response to the Notice of Violation
Transmitted with Inspection Report 91-16

NRC NOTICE OF VIOLATION 1

Technical Specification 4.6.G.2 states "In-Service testing of ASME Code Class I, Class II, and Class III pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i)."

ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition through Winter 1981 Addenda, Article IWV-3200, requires that when a valve or its control system has been replaced or repaired or has undergone maintenance that could affect its performance, and prior to the time it is returned to service, it shall be tested to demonstrate that the performance parameters which could be affected by the replacement, repair, or maintenance are within acceptable limits. Adjustments of stem packing, removal of the bonnet, stem assembly, or actuator, and disconnection of hydraulic or electrical lines are examples of maintenance that could affect valve performance parameters.

Contrary to the above, the licensee failed to perform post-maintenance stroke time testing on September 28, 1991, following a packing adjustment on the "C" Outboard Main Steam Isolation Valve (CV-4419), to demonstrate that the packing adjustment did not affect technical specification closing times prior to returning the valve to service.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO NRC NOTICE OF VIOLATION 1:

1. Reason for the Violation

The violation occurred because the technical justification for omitting post-maintenance stroke time testing was not formally documented prior to completion of the maintenance action. It is our standard practice to stroke time power-operated valves following valve packing adjustment. For the valve in question, however, maintenance and engineering personnel concluded prior to performing the described maintenance that due to the existence of slight galling on the stem of the 'C' Main Steam Isolation Valve (CV-4419) the standard practice might not result in optimizing the condition of the valve. The galled stem, when stroked across the valve packing, might tend to damage the packing and cause increased steam leakage. Because of this concern, a work plan was developed that included performing the valve packing torque

sequence recommended by the vendor to the same torque values used when the valve was last repacked in June, 1991. Following the performance of this activity, the valve was stroked and timed in accordance with quarterly surveillance requirements. Finally, the exact torque sequence was repeated to consolidate the packing to as near as possible the configuration prior to the stroke. The technical judgment of the individuals involved was that this maintenance and test process would optimize the valve packing condition and ensure that valve stroke times would be unaffected by the final torque sequence. No formal evaluation of the basis for this conclusion was documented.

2. Corrective Actions Taken and the Results Achieved

The valve was successfully stroke tested on September 30, 1991. The results of the test confirmed valve operability in accordance with the ASME code.

Guidance on the need for proper review and documentation of the acceptability of deviation from accepted standard practice has been incorporated in post-maintenance testing guidelines.

3. Corrective Actions to be Taken to Avoid Further Violations

The guidance for post-maintenance testing documentation has been implemented.

4. Date When Full Compliance was Achieved

Full compliance was achieved upon successful stroke time testing on September 30, 1991.

NRC NOTICE OF VIOLATION 2

Technical Specifications 4.13.E.1.A requires checking Fire Hose Station operability by verifying, every three months, that all valves in the flow path to the hose stations are open.

Contrary to the above, the licensee failed to determine the position of fire header isolation valves V-33-241, V-33-341, V-33-344, V-33-346, and V-33-347 and fire header cross connect valve V-33-342 from September 3, 1990, to October 17, 1991, to ensure an operable flow path to the hose stations existed.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO NOTICE OF VIOLATION 2:

1. Reason for the Violation

The failure to verify valve position was due to an incomplete test procedure. The incomplete procedure resulted from inadequate incorporation of design requirements into the surveillance program. The omitted valves were installed during the construction of a new radwaste storage facility in 1985. The need to revise the fire protection valve lineup surveillance test procedure was not identified during the review process for the design change package.

2. Corrective Actions Taken and the Results Achieved

Upon discovery by Iowa Electric personnel of the omitted valves, the valve positions were verified. All valves were found in their required open position. The surveillance test procedure was revised to include the omitted valves on October 18, 1991. The discrepancy and related corrective actions were reported under LER 91-011 on November 14, 1991.

The fire protection piping was walked down to ensure no unidentified valves exist in the flowpath to hose stations protecting safety-related equipment.

A review of surveillance testing procedures was performed to ensure fire protection technical specification surveillance requirements are being fulfilled. No further discrepancies were noted.

Since this design change package was initiated (1985) a dedicated group has been made responsible solely for testing and surveillance concerns. It is the responsibility of the specialists in this group to review the design packages and revise the test procedures as necessary.

3. Corrective Actions to be Taken

Corrective actions necessary to avoid further violations have been implemented.

4. Date When Full Compliance was Achieved

Full compliance was achieved upon verification of valve positions on the date of discovery, October 17, 1991.