

IES
INDUSTRIES INC.

February 11, 1994
NG-94-0370

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Reply to Notice of Deviation Transmitted with
Inspection Report 93019
File: A-102

Dear Dr. Murley:

This letter and its attachment are provided in response to the recent inspection of the Duane Arnold Energy Center's (DAEC's) Generic Letter (GL) 89-10 Motor-Operated Valve (MOV) Program.

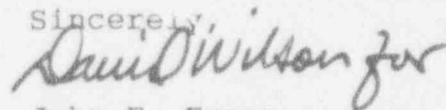
The Attachment responds to the item identified in the Notice of Deviation.

This letter contains the following new commitment:

Submit the revised GL 89-10 MOV Program Plan (including a revised dynamic test scope) to the NRC Staff by March 14, 1994.

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

Sincerely,



John F. Franz
Vice President, Nuclear

Attachment: Response To Notice Of Deviation Transmitted With
Inspection Report 93019

JFF/RJM:so

cc: R. Murrell
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
J. Martin (Region III)
NRC Resident Office
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IES UTILITIES INC.
RESPONSE TO NOTICE OF DEVIATION
TRANSMITTED WITH INSPECTION REPORT 93019

NRC NOTICE OF DEVIATION

During an NRC inspection conducted on November 29 through December 9, 1993, a deviation of commitments to the NRC with regard to Generic Letter (GL) 89-10 was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the deviation is listed below:

The licensee's December 28, 1989 response to GL 89-10 indicated the intent to meet GL 89-10 recommendations which included performing differential pressure (dp) tests where practicable and submitting any changes to scheduled commitments to the NRC staff.

Contrary to the above, as of November 29, 1993, the dp/full flow test scope was significantly reduced in that the licensee was no longer performing design-basis dp/full flow tests where practicable and furthermore, did not inform the NRC staff. The test program scope was not consistent with commitments to GL 89-10. (50-331/93019-02(DRS))

RESPONSE TO NOTICE OF DEVIATION

1. Reason For The Deviation

The DAEC dynamic testing program scope was significantly reduced in January, 1993, to reflect the complexity of dynamic testing and limited time available to complete the original testing scope. This revised dynamic testing scope, including selection strategies for determining if a valve was to be included in the dynamic (dp) testing scope, was presented to NRC Region III Staff during an IE-NRC Management Meeting in April, 1993. IE apparently did not clearly communicate the extent of the change to the program plan.

2. Corrective Steps Taken and Results Achieved

As a result of recently identified concerns regarding the DAEC's MOV Program, the MOV Team has been significantly expanded and has been restructured to ensure timely and accurate responses to NRC commitments associated with GL 89-10.

3. Corrective Actions That Will Be Taken to Avoid Further Deviations

The DAEC MOV Team is currently revising the MOV Program Plan. The revised MOV Program Plan will include guidance for establishing the dynamic testing scope. Additionally, the Program Plan will include guidance for degraded voltage, feedback of the test data to parallel train valves, pressure locking and thermal binding and other issues that were identified during the recent MCV inspection. The revised Program Plan will be forwarded to the NRC as part of the 60-day response required by NRC Inspection Report 93019. Future revisions of the program plan will be clearly communicated to the NRC.

4. Date When Corrective Actions Will Be Complete

All corrective actions will be completed by March 14, 1994, with the submittal of the revised GL 89-10 MOV Program Plan (including a revised dynamic test scope) to the NRC Staff.