

IES UTILITIES INC.

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March 14, 1994
NG-94-0815

Mr. John B. Martin
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Assessment of the Issues Described in Paragraph 4
of the Letter from G. Grant (NRC) to L. Liu
(IESUI) dated January 14, 1994

Reference: 1) Letter from G. Grant (NRC) to L. Liu (IESUI)
dated January 14, 1994 and enclosed IR 93-019
2) Letter from J. Franz (IESUI) to T. Murley (NRC)
dated February 11, 1994 (NG-94-0370)

File: A-102

Dear Mr. Martin:

During the recent inspection (Reference 1) of the Duane Arnold Energy Center's (DAEC's) program developed in response to Generic Letter (GL) 89-10, "Safety-Related Motor Operated Valve (MOV) Testing and Surveillance," the NRC inspection team identified several issues affecting the implementation of our MOV program. Specifically, Region III's assessment identified that "effective MOV program implementation has been hampered by limited management attention, and a lack of focus, team work and attention to detail." The purpose of this letter is to provide our response and describe our corrective actions. Additionally, we are submitting our revised GL 89-10 Program Plan and a description of our dynamic test scope in accordance with the commitment made in Reference 2.

Subsequent to the MOV Inspection, IES Utilities Inc. (IESUI) management reviewed the MOV Program in detail. Our review included an in-depth evaluation of resources, manpower, program structure, barriers to success and applicable procedures. As a result of this review, significant enhancements have been made to

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our MOV program and its implementation. These enhancements include more extensive and focused management oversight, a dedicated staff of 22 engineers, specialists, technicians, procedure writers and administrators and additional hardware resources.

The new MOV team has completed a thorough and detailed assessment of the DAEC MOV Program. This assessment has led to many improvements including but not limited to:

- * Planning for a more detailed review of MOV susceptibility to pressure locking and thermal binding under operating and accident conditions.
- * Stating expectations for the evaluation of test data feedback for parallel train (sibling) valves.
- * Revising the methodology used to assess operator capability under degraded voltage conditions to be consistent with industry guidance.
- * Broadening the scope of dynamic testing.
- * Incorporating use of Probabilistic Risk Assessment (PRA).

The new MOV team has also participated in team-building training to improve its attention to detail and focus. The new team continues to review its progress, goals and expectations and provide detailed briefings to management so as to ensure successful completion of the program.

As discussed with members of your staff at a recent NRC-DAEC meeting on our MOV program, we believe that the changes described above will result in an effective MOV program with substantial improvements in management attention, teamwork and attention to detail. An outline of that presentation is included as Attachment 1. We understand that NRC Region III management concurs with our assessment of the MOV program and the improvements we have implemented. Additionally, we plan to pursue frequent communications with your staff regarding our MOV program progress and issues.

This letter also addresses the commitment made in Reference 2, "Submit the revised GL 89-10 Program Plan including a revised dynamic test scope". This letter transmits the revised GL 89-10 Program Plan as Attachment 2.

The MOV team is currently revising the scope of valves to be

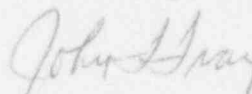
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dynamically tested. If dynamic tests are practicable, the new scope will be considerably broader in order to further substantiate program assumptions. After this effort has been completed, the revised scope of dynamic testing will be clearly communicated to your staff.

This letter contains no new commitments.

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

Sincerely,



John F. Franz
Vice President, Nuclear

Attachments: 1) GL 89-10 MOV Project Status Update
2) Motor Operated Valve Program Plan

JFF/RJM:so

cc: R. Murrell
L. Liu
L. Root
R. Pulsifer (NRC-NRR)
U.S. NRC Document Control Desk
NRC Resident Office
DCRC

Duane Arnold Energy Center GL 89-10 MOV Project Status Update

3-3-94

Where we have been:

- Oct. 93 Assessment of current MOV team by PM
- Nov. 93 MO 2239 NRC Review
 - New Acceptance Criteria
 - Scope of dp testing
 - Technical positions
- Nov. 93 Review of "old" test data
- Nov. 93 Division Management review of status
- Nov. 93 Phase II NRC inspection
- Dec. 93 Team review of current status
- Jan. 94 Reorganization of MOV Team

What we have done:

1. Team Related

- Management Involvement
 - Routine PM reviews with Managers
 - Special Management meetings with MOV Team
 - Monthly reviews with division management
- Dedicated Team
 - QA representation on team
 - Proven expertise
 - Contract Engineering support
- Milestone schedule
- Program assessment activities:
 - Internal
 - External
 - Punchlist of all assessment recommendations
 - Lessons learned document
 - customer interviews
- Team Member training:
 - Teamwork
 - MOV basics
 - Advanced diagnostic training, 3-14-94
- Improved communication:
 - Internal
 - Industry
 - Regulators

2. Program Related

- Program plan revision
- Expanded Program Manual including Program plan
- Revised Acceptance Criteria
- Improved Procedures;
 - Operability assessment
 - Program Manual
 - Team operational guidelines
 - Revised field testing procedure
- Increased valve parameter testing; torque, more data points
- Use of DAEC PRA
- Analysis of Pressure Locking / Thermal Binding phenomenon
- Re-examination of 89-10 population
- Ongoing review of "old" test data
- Complete technical positions; including linear extrapolation and sibling valves
- Improved valve data organization and retrieval capabilities
- Remaining static tests completed prior to 6-28-94
- Expanded dp test scope

Where we are going:

Project goals:

- Assure the correct operation of all 89-10 valves
- Complete original G.L. 89-10 requirements
 - Remaining static tests completed using best available information
 - Continue dp testing
 - 89-10 Extension Request
- Implement tracking and trending program
- Implement long term MOV Program