



Entergy Nuclear Generation Co.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

April 11, 2000
ENG C Ltr.2.00.027

Mike Bellamy
Site Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Docket No. 50.293
License No. DPR-35

Subject: GL95-07 Revised Response to Second Request for Additional Information

This letter revises the response provided by ENG C Ltr. 2.99.078, "GL 95-07 Response to Second Request for Additional Information" dated August 16, 1999. In that response, Pilgrim Station (PNPS) evaluated the potential for pressure locking of selected motor operated valves using a methodology described in NUREG/CP-0146. It has been determined that the pressure locking prediction methodology developed by Commonwealth Edison (ComEd) predicts thrusts that compare more favorably to actual test results and is more conservative, therefore, PNPS has adopted the ComEd methodology. With the exception of the methodology change, the responses and commitment in ENG C Ltr. 2.99.078 have not changed except as described below.

The ComEd methodology has been applied in accordance with the methodology's guidelines. Preliminary results indicate that valves MO2301-3, MO1001-34B, and MO1001-23A/B have greater than 40 % margin between actuator capability and the calculated pressure locking thrust value. MO1001-34A has approximately a 30 % margin. This value is acceptable in the interim until a modification to eliminate susceptibility or a margin greater than 40 % can be achieved. Therefore, PNPS makes the following commitment:

- PNPS will complete the actions necessary to eliminate pressure locking susceptibility or to achieve a margin of 40 % for MO1001-34A using the ComEd methodology by the end of RFO #13.

Should you have any further questions, please contact Jeff Rogers, (508) 830-8110, of Regulatory and Industry Affairs.

Sincerely,

A handwritten signature in black ink that reads "Mike Bellamy".

Mike Bellamy

JLR/

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