GPU NUCLEAR

GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

May 12, 2000
1940-00-20133

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Response to Request for Additional Information
Generic Letters 89-10 and 96-05

The USNRC staff recently requested additional information from GPU Nuclear, Inc. relating to two issues in our motor operated valve program. Attachment I to this cover letter provides the requisite information.

If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

Very truly yours,

Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station

SL/JJR
Attachment
cc: Administrator, Region I
NRC Project Manager
Senior Resident Inspector

A064

NRC Question 1:

Describe the plan at Oyster Creek for ensuring adequate AC and DC Motor Operated Valve (MOV) motor actuator output capability, including consideration of guidance in Limitorque Technical Update 98-01 and its Supplement 1. Clarify if there are any DC powered MOVs in the Oyster Creek Generic Letter 96-05 program. Briefly discuss the MOV parameters that are trended in order to detect degradation of MOV performance.

GPUN Response to Question 1:

Oyster Creek incorporated Limitorque Technical Update 98-01 and its Supplement 1 into our design basis calculations prior to the last refueling outage (17R, November 1998). Oyster Creek has utilized the Commonwealth Edison AC motor methodology for those valve motors that were considered exceptions to the Limitorque Update and where needed to demonstrate additional torque margin. The Oyster Creek Generic Letter 89-10 and 96-05 program scope includes six DC powered MOVs. Oyster Creek has been doing DC MOV stroke time calculations that take into account motor speed dependencies on voltage, load, and temperature since 1994. GPUN introduced our initial methodology at EPRI's Fifth Valve Technology Symposium to the industry in June 1995. GPUN has also played an active role in the current development of the BWROG Methodology (subcontracted to MPR).

To detect degradation in MOV performance, Oyster Creek will:

1. Continue to perform periodic static diagnostic testing and trending to confirm MOV capability, proper control switch settings and MOV condition.
2. Continue to perform appropriate preventive maintenance activities such as stem lubrication, actuator and limitswitch gearcase inspection, and
3. Perform actuator refurbishments as needed based on results of item (2) in order to provide reasonable confidence of proper actuator performance.

NRC Question 2:

The licensee's letter dated March 17, 1997, states that the maximum interval between MOV static diagnostic tests will not exceed 10 years. In the NRC SE dated October 30, 1997, on the Westinghouse Owners Group (WOG) Topical Report MPR-1807 describing the JOG program, the NRC staff stated that MOVs tested at frequencies beyond 5 years will need to be grouped with other MOVs that will be tested at frequencies less than 5 years in order to validate assumptions for the longer test intervals. The NRC staff stated that this review must include valve thrust (or torque) requirements and actuator output capability. The licensee should describe how its MOV static diagnostic testing program will satisfy this condition of the NRC SE.

GPUN Response to Question 2:

JOG responses to NRC comments in this regard (and referenced in the SE), state

1. "One of the objectives of the JOG Program is to establish whether and to what extent the operating history, environment, and application affect needed margin and test frequency. The recommended general test frequency is an interim approach until the criteria can be refined (if needed), based on the results of the program. Licensees will be informed of changes to the criteria, and will consider operating history, environment and application through this mechanism." And,
2. "The JOG Dynamic Test Program is to be completed within 5 years. On at least an annual basis, the data in the program are to be reviewed to determine if changes to the program or the criteria are warranted. Through this mechanism, valves which should be tested more frequently (and specifically at intervals less than 5 years) will be identified in a timely way."

The JOG has met semiannually to review dynamic test data and has a methodology to alert utilities (via feedback notices) of the need to change any part of the JOG Program (interim or otherwise). The Oyster Creek Test Program receives and evaluates the JOG notices from the BWROG and adjusts the test frequencies accordingly. Oyster Creek considered operating history and environment when the MOV required PM frequencies were established. In conjunction with this, all program MOVs have been placed on a schedule where they will all be tested (from the MCC) within 5 years of the previous test to confirm that MOV performance is not degrading.