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SUBJECT: Provides response to request for addl info re rev to scope of program recommended by GL 89-10, "Safety-Related Motor-Operated Valve Testing & Surveillance."

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September 7, 1993

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269,-270,-287
Revision of GL 89-10 Program Scope
Response to Request for Additional Information

By letter dated March 23, 1993 I advised the NRC of the revision to the scope of the program recommended by Generic Letter (GL) 89-10 "Safety-Related Motor-Operated Valve Testing and Surveillance." Briefly, the scope of the Oconee GL 89-10 program has been limited to active gate, globe, and butterfly valves. Non-gate/globe/butterfly valves and motor-operated valves (MOVs) which are not active valves have been excluded from the revised program scope. By letter dated August 5, 1993 the NRC staff requested additional information regarding the revised program scope. The following information is provided in response to this request.

Position changeable MOVs:

As detailed in my March 23, 1993 letter, valve mispositioning coincident with an additional single failure is beyond the design basis for Oconee. Further, GL 89-10 recommended action "e" clearly limits the scope of the program to the existing plant design basis. In the August 5, 1993 request for additional information, the NRC staff acknowledged that valve mispositioning might be beyond a plant's design basis and a study was under way to determine whether GL 89-10 recommendations for PWR valve mispositioning should be continued. Regardless, the staff stated that these valves should not be removed from the Oconee GL 89-10 program pending completion of this study.

Duke understands the significance of position changeable MOVs and the uncertainty regarding their inclusion within the 89-10 program. Position changeable MOVs which are active valves (e.g.,required to move to accomplish a design basis function) have been retained within the scope of the Oconee GL 89-10 program. However, inclusion of position changeable MOVs (which are not active valves) within the scope of the Oconee GL 89-10 program is clearly beyond the design basis. Based on the above, it is inappropriate to include position changeable MOVs (which are not active valves) within the scope of the Oconee GL 89-10 program at this time. In the event the NRC study concludes GL 89-10 recommendations are appropriate for PWR valve mispositioning, the exclusion of position changeable MOVs

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(which are not active valves) from the Oconee GL 89-10 program will be reconsidered.

Number and types of valves excluded from the revised program scope:

The scope of the Oconee GL 89-10 program has been reduced by 100 valves since the last NRC 89-10 audit (reference NRC Inspection Report 50-269,-270,-287/91-13). Of this number, 26 are non-gate/globe/butterfly valves (plug, ball, etc.). The remaining 74 valves have been removed based on design basis reviews and upgrades. Therefore, the current Oconee GL 89-10 program scope includes 245 valves.

It is important to note that MOVs that are removed from the GL 89-10 program are reviewed by the station MOV maintenance program and assigned appropriate preventative maintenance and surveillance activities. In some cases, diagnostic and predictive maintenance methods similar to those within the GL 89-10 program are utilized. The continued refinement of the scope of the Oconee GL 89-10 program enables the station to better focus resources on those MOVs that are critical to operations during design basis accident scenarios.

Very Truly Yours,

J. W. Hampton

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ONRR

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P. E. Harmon, Senior Resident Inspector
Oconee Nuclear Station