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SUBJECT: Submits 180-Day response to GL 96-05 re periodic verification of Design-Basis capability of safety-related MOVs.

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**DUKE POWER**

March 17, 1997

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

Subject: McGuire Nuclear Station Units 1 & 2  
Docket Nos. 50-369, 370  
Catawba Nuclear Station Units 1 & 2  
Docket Nos. 50-413, 414  
Oconee Nuclear Station Units 1, 2, & 3  
Docket Nos. 50-269, 270, 287  
180-Day Response to Generic Letter 96-05:  
Periodic Verification of Design-Basis Capability  
of Safety-Related Motor-Operated Valves

On September 18, 1996, the NRC issued Generic Letter 96-05, "Periodic Verification of Design Basis Capability of Safety Related Motor-Operated Valves." The generic letter requested a 60-day and 180-day response from licensees. The 60-day response was submitted to you on November 14, 1996. This letter provides Duke Power Company's 180-day response to GL 96-05.

In accordance with GL 96-05 and the commitment made in our 60-day response, Duke Power Company has performed the requested actions for Oconee, Catawba, and McGuire Nuclear Stations. This letter summarizes the actions taken, conclusions reached, and provides a description of the program to be implemented.

Upon review of our current GL 89-10 based Periodic Verification Program, we have found that program enhancements are necessary to meet the intent of GL 96-05. As a result, Duke Power is participating in the development of a generic industry wide periodic verification program to address GL 96-05. This program is known as the "Joint BWR and Westinghouse Owner's Group Program on Motor-Operated Valves (MOV) Periodic Verification Program" (JOG-PV). Duke

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Power intends to implement the JOG-PV Program as described in MPR report 1807 Rev. 0 and submitted to the NRC via WOG letter OG-97-018. Since the JOG-PV program is still under development, Duke Power's participation may be reevaluated. In this event, a Duke specific periodic verification program, or other industry program, that meets the intent of GL 96-05 would be implemented. Additionally, the NRC would be formally notified of this change and provided a new program description and implementation schedule. The scope of MOVs in the periodic verification program will be the same as the present GL 89-10 program scope at Oconee, McGuire, and Catawba Nuclear Stations.

Duke Power will transition to the JOG-PV Program in the first quarter of 1998.

Enclosure 1 of this letter provides a summary of Duke Power's current periodic verification program and describes the transition to the JOG-PV program. Enclosure 2 of this letter provides a list of commitments made as a result of this letter.

I declare under penalty of perjury that these statements are true and correct to the best of my knowledge.

Should you have any questions regarding this submittal, please contact A. Young at (704) 382-3154.

Very truly yours,



M. S. Tuckman  
Senior Vice President  
Nuclear Generation

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**ENCLOSURE 1**

**DUKE POWER COMPANY  
OCONEE, CATAWBA, and McGUIRE NUCLEAR STATIONS**

**NRC Generic Letter 96-05, Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves**

**Subject: Transition from Current Periodic Verification (PV) Program to JOG-PV Program**

**Duke Power's current GL 89-10 based PV Program**

The current GL 89-10 PV program at Oconee and McGuire stations requires periodic static tests within 5 years/3 RFOs for all GL 89-10 MOVs. Catawba's PV program requires that Group 1 MOVs be tested within 5 years/3 RFOs and Group 2 MOVs within 8 years/6 RFOs. Test intervals at each site would be adjusted based on trending results. Static testing methods include "at-the-valve" methods where thrust/torque is measured and/or "at-the-motor-control-center" methods when applicable. The test frequency of 5 years/3 RFOs is an NRC accepted interval and is not based on risk insights. Operability of each MOV is assured by design bases evaluation and controlled by each station's GL 89-10 program. Periodic static tests are performed to provide additional confidence of functional readiness, as well as quantify aging effects.

**GL 96-05 PV Program (JOG-PV)**

Duke Power is a member of the Westinghouse Owners Group which has formed a joint committee with the BWR Owners Group to develop a generic, industry wide, program to address GL 96-05. Duke Power is participating in the development of this program known as the "Joint BWR and Westinghouse Owner's Group Program on Motor-Operated Valves Periodic Verification Program (JOG-PV).

Under the JOG program, Oconee, McGuire, and Catawba Nuclear Stations, will statically test their respective GL 89-10 MOV populations at a frequency based on criteria in the topical report (MPR 1807 Rev. 0). These criteria include both MOV margin and PRA/risk considerations. Static testing methods will include "at-the-valve" methods where thrust/torque is measured and/or "at-the-motor-control-center" methods when applicable.

The PRA methodology used at Oconee, McGuire, and Catawba Nuclear Stations will use the guidelines contained in (or meet the intent of) the Westinghouse Owners Groups' Topical Report (V-EC-1658 Rev. 0) and/or the BWR Owners' Group Topical Report NEDC 32264, "Application of Probabilistic Safety Assessment to Generic Letter 89-10 Implementation." In addition, an expert panel will review the results of the PRA/risk analysis, providing further input into the static testing frequency.

As a participant in the JOG-PV program, Oconee, McGuire, and Catawba Nuclear Stations will perform differential pressure (dP) tests on MOVs as required to support the program. MOV maintenance activity may result in changes to, omission of, or substitutions in, the MOVs being dP tested. DP test results from Oconee, McGuire, and Catawba Nuclear Stations will be combined with an industry data pool (approximately 100 units) to quantify valve factor age-related degradation.

Oconee, McGuire, and Catawba McGuire Nuclear Stations will review and trend static and dynamic test data to determine if PV program adjustments are necessary (i.e., test frequency, and/or aging considerations).

### **Program Transition**

The transition from Duke Power's current GL 89-10 PV program to the JOG-PV program requires several actions. First, in order to establish static testing frequencies, a PRA/risk analysis must be performed at Oconee, McGuire, and Catawba. JOG-PV participants must also dP test select MOVs in accordance with a JOG specified test procedure. GL 96-05 identified the ASME OMN-1 code case recommendation to eliminate IST stroke time tests. In order to meet the 180-day response period of GL 96-05, the JOG plans to review OMN-1 at a later date. Therefore, the current IST stroke time-testing for GL 89-10 MOVs will be maintained. The JOG is in the process of requesting clarifications from the ASME Working Group OM-8, regarding the interpretation of OMN-1. Duke Power will consider the applicability of OMN-1 after the PV program is established and a recommendation from the JOG is received.

### **Implementation Schedule**

Duke Power will transition to the JOG-PV Program in the first quarter of 1998.

ENCLOSURE 2

DUKE POWER COMPANY  
OCONEE, CATAWBA, and McGUIRE NUCLEAR STATIONS

NRC Generic Letter 96-05, Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves

Subject: GL 96-05 Commitments (Oconee, McGuire, and Catawba Nuclear Stations)

1. Duke Power intends to implement the JOG-PV Program as described in MPR report 1807 Rev. 0 and submitted to the NRC via WOG letter OG-97-018. Since the JOG-PV program is still under development, Duke Power's participation may be reevaluated. In this event, a Duke specific periodic verification program, or other industry program, that meets the intent of GL 96-05 would be implemented. Additionally, the NRC would be formally notified of this change and provided a new program description and implementation schedule.
2. Duke Power will participate in the JOG's Evaluation process to determine the impact of dP test data and make adjustments to the program as appropriate.
3. Duke Power will transition to the JOG-PV Program in the first quarter of 1998.
4. Duke Power will review and trend static and dynamic test data to determine if PV program adjustments are necessary (i.e. test frequency, and/or aging considerations).