



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

October 23, 1992

Docket Nos. 50-275
and 50-323

Mr. Gregory M. Rueger
Nuclear Power Generation, B14A
Pacific Gas and Electric Company
77 Beale Street, Room 1451
P.O. Box 770000
San Francisco, California 94177

Dear Mr. Rueger:

SUBJECT: EXTENSION OF SCHEDULE FOR COMPLETION OF PROGRAM IN RESPONSE TO
GENERIC LETTER 89-10 AT DIABLO CANYON

On June 28, 1989, the NRC staff issued Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," which requests licensees to establish a program to provide for the testing, inspection, and maintenance of safety-related motor-operated valves (MOVs). In particular, the staff requests licensees (1) to perform design-basis reviews of MOVs within the scope of the generic letter to determine the differential pressure and flow conditions under which the MOVs must operate, (2) to review and to revise, as necessary, the methods for selecting and setting MOV switches, (3) to test MOVs within the program in situ under their differential pressure conditions where practicable and to develop alternatives where such testing is not practicable, (4) to prepare or revise procedures to ensure that adequate MOV switch settings are maintained throughout the life of the plant, and (5) to analyze or justify each MOV failure and corrective action and to trend the MOV data.

The staff recommended a two-stage approach for MOVs that could not be tested under design-basis differential pressure conditions. As described in Supplement 1 to GL 89-10, the licensee would size and set the MOV using the best data available, including testing under maximum achievable conditions, as Stage 1 of the two-stage approach. Under Stage 2, the licensee would complete the evaluation of MOV capability after obtaining applicable data. The staff requested that the test program be completed by June 28, 1994, or three refueling outages after December 28, 1989, whichever is later. In Supplement 1 to GL 89-10, the staff stated that both stages of the two-stage approach could be completed within the five-year or third outage schedule of GL 89-10. Also in GL 89-10, the staff requested licensees to verify MOV capability every five years or every third refueling outage.

In the response (dated December 27, 1989) to GL 89-10, Pacific Gas and Electric Company (PG&E) committed to complete the recommendations of the generic letter in the recommended schedule for Diablo Canyon. The scheduled completion date for Unit 1 is near the end of 1994 (using three outages) and June 28, 1994, for Unit 2 (using the five-year schedule). In a letter dated

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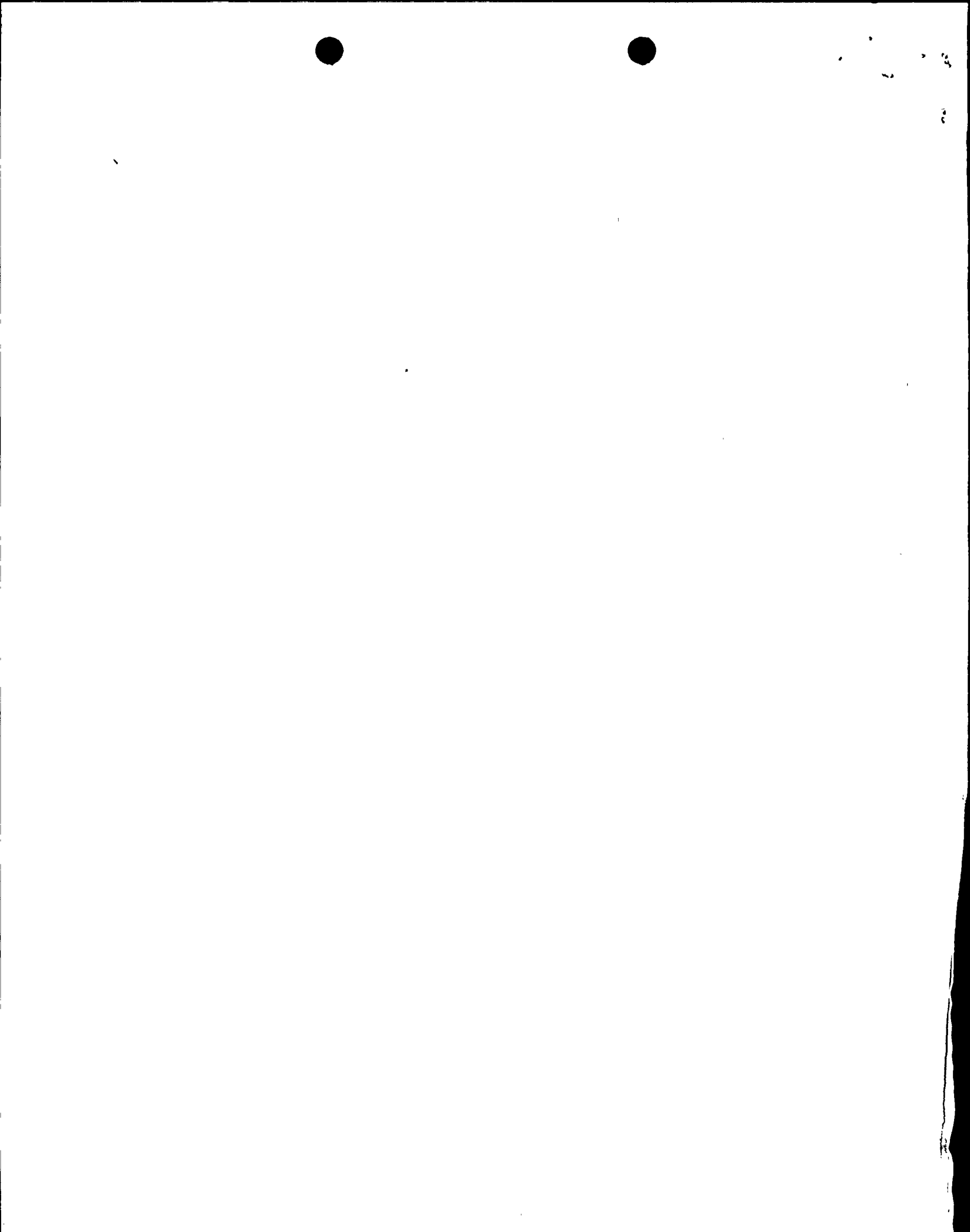
August 12, 1992, you stated that PG&E plans to complete Stage 1 of your GL 89-10 program by the sixth refueling outage for both Units 1 and 2. According to your letter, this schedule corresponds to June 1994 for Unit 1 and November 1994 for Unit 2. You also stated that PG&E intends to use the MOV Performance Prediction Methodology being developed by the Electric Power Research Institute (EPRI) to complete Stage 2 of the two-stage approach. You also emphasized PG&E's commitment to test all MOVs to be addressed by the two-stage approach under maximum achievable conditions by December 1994. However, you did not provide your schedule for completion of Stage 2 of the two-stage approach.

By telephone on September 29, 1992, the NRC staff and representatives of PG&E discussed your plans for completing the GL 89-10 program at Diablo Canyon. In that conversation, PG&E representatives stated that your methodology for sizing and setting MOVs will be validated by your testing program by the end of 1994. PG&E representatives stated that a plan and date for completing Stage 2 of your GL 89-10 program will be determined in the upcoming months.

In accordance with GL 89-10, a licensee must notify the NRC staff of any changes to its scheduled commitments in response to the generic letter. In Supplement 1 to GL 89-10, the NRC staff states that it will consider the justification provided by licensees intending to extend their scheduled commitments to GL 89-10 on a case-by-case basis. The generic letter indicates that licensees must retain the justification for those changes on site for NRC review. During a future inspection, the NRC staff will review the justification for your schedule for completing the GL 89-10 program.

In a letter dated August 19, 1992, to the Nuclear Management and Resources Council, the NRC staff discussed the evaluation of proposed changes to the scheduled commitments of the licensee in implementing their GL 89-10 programs. A significant factor that the staff will consider in evaluating the scheduled changes include the licensee's aggressive approach in working to resolve the concerns about MOV performance at its facility. As discussed during the telephone conversation on September 29, your plan for completing Stage 2 should include verification of your MOV sizing and switch setting methodology used for Stage 1 of the two-stage approach within one refueling outage of completing Stage 1 of your program. Your verification method may include use of the EPRI MOV Performance Prediction Methodology (if the NRC staff comments on the completed methodology as being appropriately addressed), data obtained directly from the EPRI tests, or from other techniques where adequately justified.

In NRC Inspection Report 50-275 and 50-323/91-39, the NRC staff documented the findings of an inspection of the program being developed at Diablo Canyon in response to GL 89-10. On July 30, 1992, PG&E submitted a reply to those findings. During a future inspection, the NRC staff will review the implementation of the actions outlined in your July 30 submittal. Among the aspects that the staff will evaluate are (1) your justification for using current less than the current that would result under locked-rotor conditions in determining minimum voltage available at each MOV, (2) your consideration of high valve factors observed during MOV tests at Diablo Canyon in terms of



operability of the tested MOVs and other applicable MOVs, (3) your justification for assumed stem friction coefficients, and (4) your justification for assumed torque switch repeatability less conservative than recommended by the actuator manufacturer.

Based on the above considerations, we find your proposed extension request to be acceptable.

Sincerely,

Original signed by

Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

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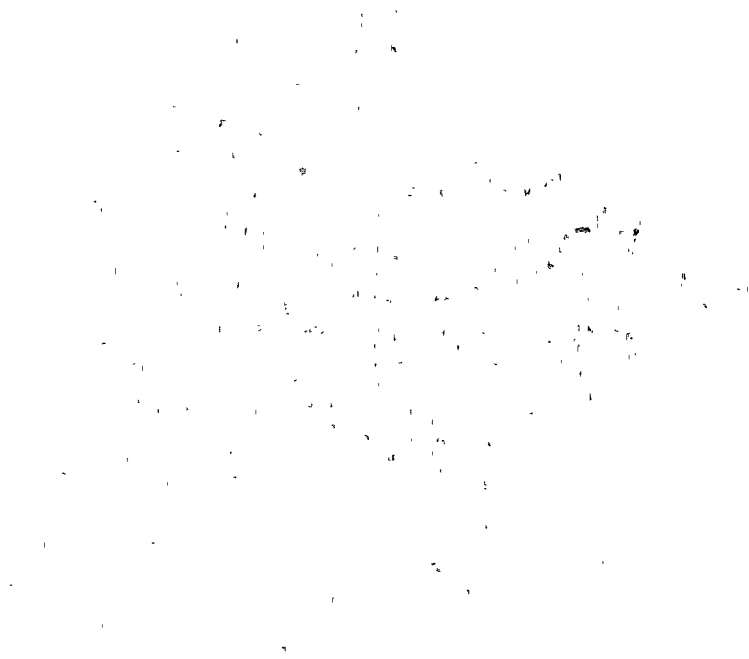
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PLATE 1



Mr. Gregory M. Rueger

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Sincerely,



Harry Rood, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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