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SUBJECT: Informs that requested extension from reporting requirements of GL-89-10, "Safety-Related Motor-Operated Valve Testing & Surveillances," no longer needed.Response to GL-96-05 is attached.

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NIAGARA MOHAWK
GENERATION
BUSINESS GROUP

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RICHARD B. ABBOTT
Vice President and
General Manager – Nuclear

June 9, 1997
NMP1L 1226

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

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Subject: ***Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillances" and GL 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves"***

Gentlemen:

On March 17, 1997, Niagara Mohawk Power Corporation (NMPC) requested an extension from the reporting requirements of GL 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance" item m which requires notification in writing within 30 days after actions have been completed. For Nine Mile Point Unit 1 (NMP1), this requirement is 30 days after the 1997 refueling outage. The NMP1 refueling outage was originally scheduled to be completed in early April 1997. However, restart from the outage was delayed, which afforded the opportunity to complete our GL 89-10 actions, including Information Notice (IN) 97-07, "Problems Identified During Generic Letter 89-10 Close Out Inspections." Therefore the requested extension is no longer required. The GL 89-10 program has been completed for NMP1.

Additionally, the commission issued GL 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves," on September 18, 1996 to: 1) discuss the performance verification of the capability of safety-related motor-operated valves (MOVs) to perform their safety functions consistent with the current licensing basis of Nuclear Power Plants; and, 2) request that addressees submit a written summary of its MOV periodic verification program

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established in accordance with the Requested Action paragraph or the alternative course of action established by the addressee. In accordance with Required Response 2, Attachment A to this letter contains NMPCs response to GL 96-05 for Nine Mile Point Unit 1 (NMP1) which is required at the completion of the GL 89-10 Program.

Very truly yours,

Richard B. Abbott

Richard B. Abbott
Vice President and General Manager - Nuclear

RBA/GJG/cmk
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator
Mr. B. S. Norris, Senior Resident Inspector
Mr. A. W. Dromerick, Acting Director, Project Directorate I-1, NRR
Mr. D. S. Hood, Senior Project Manager, NRR
Records Management

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	**Docket No. 50-220**
	)	
Nine Mile Point Unit 1	)	

Richard B. Abbott, being duly sworn, states that he is Vice President and General Manager - Nuclear of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the document attached hereto; and that the document is true and correct to the best of his knowledge, information and belief.

Richard B. Abbott
Vice President and General Manager - Nuclear

Subscribed and sworn before me,
in and for the State of New York
and the County of Oswego,
this 9th day of June, 1997

Linda M. Landers
NOTARY PUBLIC

LINDA M. LANDERS
Notary Public, State of New York
Registration No. 4908015
Qualified in Jefferson County
Commission Expires October 13, 1997

LINDA M. LANDERS
Notary Public, State of New York
Registration No. 4908015
Qualified in Jefferson County
Commission Expires October 13, 19__

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION UNIT NO. 1

Requested Actions

Each addressee of this generic letter is requested to establish a program, or to ensure the effectiveness of its current program, to verify on a periodic basis that safety-related MOVs continue to be capable of performing their safety functions within the current licensing bases of the facility. The program should ensure that changes in required performance resulting from degradation (such as those caused by age) can be properly identified and accounted for. Addressees that have developed periodic verification programs in response to GL 89-10 should review those programs to determine whether any changes are appropriate in light of the information in this GL.

NMP1 Response

A summary description of the NMP1 program is as follows:

- The scope of the MOV Periodic Verification Program includes 37 MOVs that were included in the GL 89-10 MOV program.

- The NMP1 MOV Periodic Verification Program incorporates risk insights to prioritize MOV periodic testing activities such as frequency of individual valve tests and selection of valves to be tested. Based upon current 24-month refueling cycles, high risk MOVs are tested statically at a maximum test interval once per three fuel cycles, while low risk valves are tested statically at a maximum test interval of once per five fuel cycles (ten-year maximum). More frequent testing is mandated for low margin valves (i.e. as-left thrust output compared to required thrust output) and may be performed for plant-specific or valve-specific concerns.

- In addition, NMPC is participating in the BWROG/WOG/CEOG (JOG) Periodic Verification Program (i.e., GE NEDC-32719 March 1997). Long-term periodic differential pressure testing needs will be based on the results of the JOG program and feedback from plant-specific testing.

- NMP1 is not planning to adopt ASME OM-8 code case OMN-1 for initial periodic verification of MOVs. The applicable IST program MOVs will continue to be stroke-time tested in accordance with NMP1's approved IST program plan.

- Review of testing results from periodic verification activities will be procedurally controlled including provisions for identification of adverse (or improving) trends. A biennial (every two years) summary review of test results will be performed. Program adjustments will be made based upon these reviews. In addition, NMP1 will incorporate periodic verification program adjustments as appropriate based upon feedback from the JOG periodic verification program and as industry information becomes available.

- Diagnostic equipment utilized for periodic testing may include motor power diagnostic testing in lieu of stem thrust (or yoke) measurements. Appropriate adjustments will be incorporated for the accuracy and limitations of this alternate diagnostic method. Stem thrust (or yoke) measurements are used for setup of MOVs after actuator overhaul or major valve maintenance, in accordance with Generation Administration Procedures.

- The present stem lubrication frequency of most MOVs is once every two years. As such, maintenance activities, including stem lubrication, may occur between periodic verification tests. Sufficient as-found and as-left testing will be performed to evaluate the affect of such activities on valve performance.

The NMP1 MOV Periodic Verification program is intended to address potential degradation that can result in an increase in thrust or torque requirements to operate valves or a potential decrease in output capability of the motor actuator. Static diagnostic testing is normally adequate for addressing potential increasing thrust or torque requirements, since additional margin and enveloping valve factors have been incorporated to account for potential degradation such as progressive guide and seat damage or rising disk friction. In addition, static testing can detect a number of other internal valve problems. The static testing confirms the capability of the motor actuator to provide the required torque. The added margin allowance for potential increases in thrust requirements due to internal valve degradation provide assurance that MOVs can function properly over periodic verification periods. The dynamic differential pressure testing performed through the JOG periodic verification program is expected to confirm the necessary margin required to support periodic static diagnostic testing as the method for periodic verification of design capability for the balance of plant life.

NMP1 is committed to test valves under the JOG periodic verification program and in accordance with the JOG testing methodology. Necessary adjustments will be performed to address any NRC issues on the JOG Periodic Verification program when issued. As industry developments occur, new technology becomes available, and future developments dictate, NMP1's periodic verification program will be revised and maintained such that it will remain capable of assuring proper periodic verification of MOV capability for the remaining plant operating life.