

CATEGORY 1

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SUBJECT: Informs of change in commitment re feedwater isolation valves, per GL 89-10 program. Licensee has revised actuator sizing calculations to bound differential pressure. Mod to valves is unnecessary & will not be performed.

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TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveillance"

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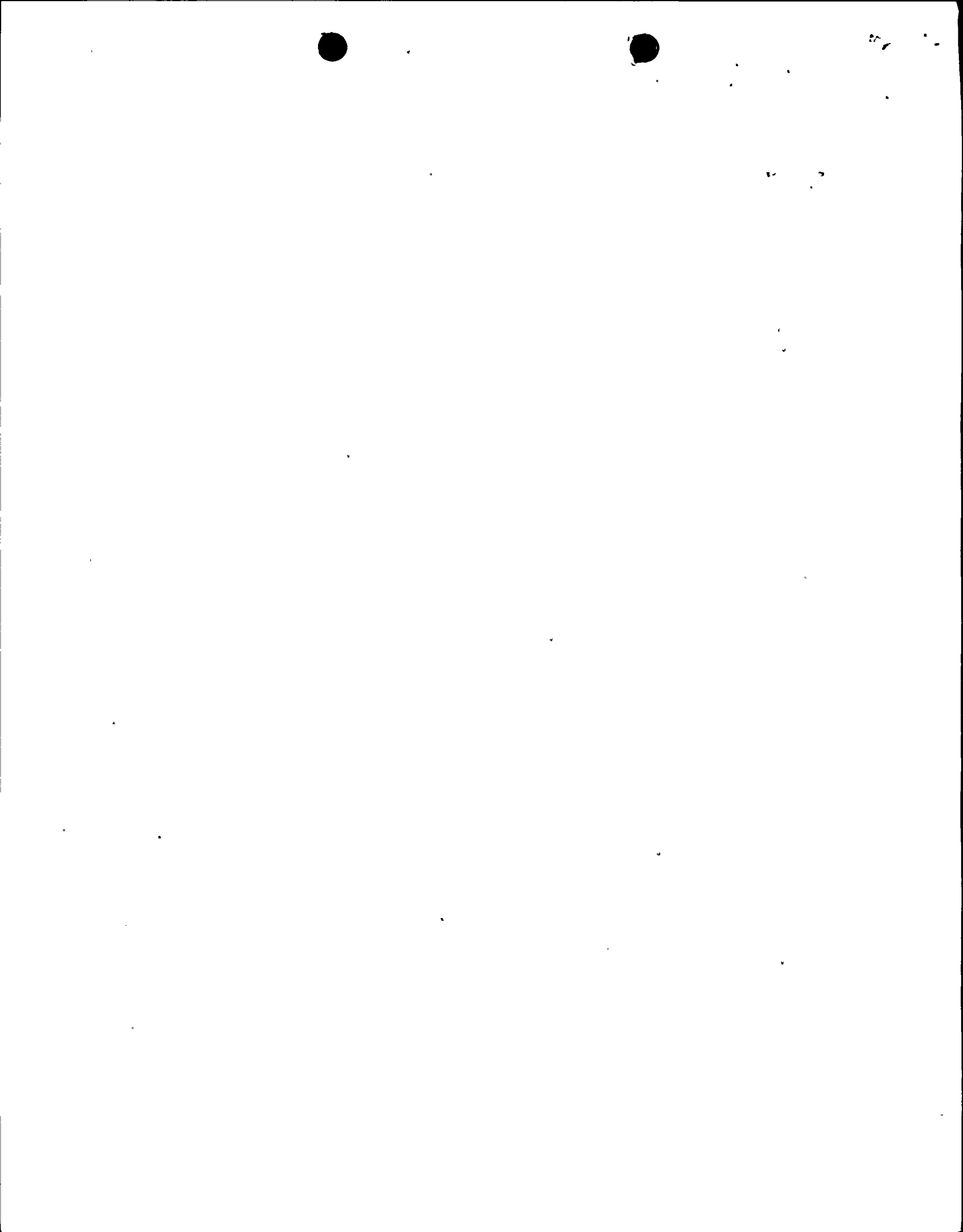
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February 12, 1999
NMP1L 1406

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: *Change of Commitment Regarding Feedwater Isolation Valves and the Generic Letter 89-10 Program*

Gentlemen:

During NRC Inspection 97-09, the NRC identified some remaining issues associated with Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance." In a letter dated September 30, 1997 (NMP1L 1253), Niagara Mohawk Power Corporation (NMPC) committed to modify the Nine Mile Point Unit 1 (NMP1) Feedwater (FW) isolation valves 31-07 and 31-08 during the next refueling outage (Spring 1999) to increase the actuator capacities.

NMPC has determined that the actuators for these valves do not need to be modified to perform their safety-related function and is, therefore, revising its previous commitment. We have reviewed our licensing and design bases and determined that the largest differential pressure, for a safety-related design bases function for these valves, occurs on closure for containment isolation. We have revised the actuator sizing calculations to bound this differential pressure. The Electric Power Research Institute (EPRI) Performance Prediction Methodology (PPM) does not directly address the Edwards Equiwedge design for these valves. However, the revised actuator sizing calculations use a required thrust that was derived for NMPC by MPR Associates, Inc., using EPRI MOV methods. There is adequate margin between the current torque switch setting and the required setting determined by the revised sizing calculations. FW isolation valves 31-07 and 31-08 continue to be maintained in the GL 89-10 program.

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Therefore, the previously committed modification to the valves is unnecessary and accordingly, will not be performed.

Very truly yours,



Richard B. Abbott
Vice President - Nuclear Engineering

RBA/TWP/kap

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