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SUBJECT: Comment opposing suppl 6 to GL 89-10.

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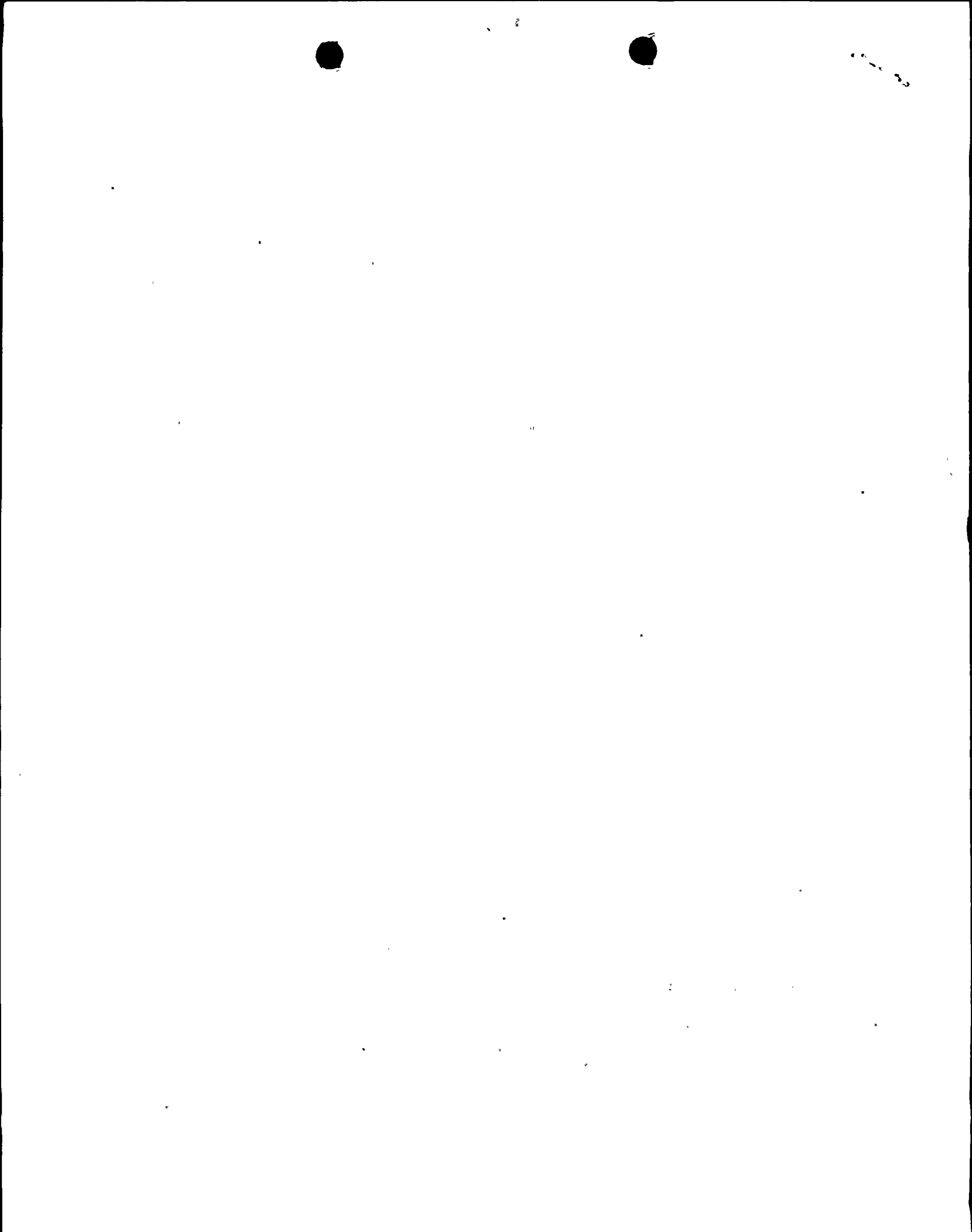
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B. Ralph Sylvia
Executive Vice President
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August 23, 1993
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OFFICE OF ADMINISTRATIVE SERVICES

Chief, Rules and Directives Review Branch
United States Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMMENTS ON PROPOSED SUPPLEMENT 6 TO GENERIC LETTER 89-10; "INFORMATION ON SCHEDULE AND GROUPING, AND STAFF RESPONSES TO ADDITIONAL PUBLIC QUESTIONS", 58 FED. REG. 39, 243 (JULY 22, 1993)

Gentlemen:

On July 22, 1993, the Nuclear Regulatory Commission published for comment a draft Generic Letter (Generic Letter 89-10, Supplement 6) entitled "Information on Schedule and Grouping, and Staff Responses to Additional Public Questions," 58 Fed. Reg. 39, 243 (July 22, 1993). This draft supplement to Generic Letter (GL) 89-10 is intended to communicate expectations of the NRC as to the actions a utility needs to take in order to receive an extension for completing GL 89-10. Also, the proposed supplement discusses the scope and use of PRA in prioritizing motor-operated valve (MOV) testing. Niagara Mohawk offers the following comments regarding specific sections of the draft Generic Letter supplement and enclosure:

Motor-Operated Valve Grouping (Page 3 of the Generic Letter, Item 2)

The proposed Generic Letter supplement uses the words "at or near plant-specific design basis conditions." This wording should be expanded to explain what percentage of design basis differential pressure (e.g., 80%, 90%, 95%) would be considered acceptable. Also, the parenthetical statement in item 2 should be expanded to read as follows: (Nominally 30 percent and no less than two MOVs for groups of four or more valves). Small groups of valves (e.g., 2 valves) would not meet this consideration unless both valves were tested.

Motor-Operated Valve Grouping (Page 4 of the Generic Letter, Item 6)

The proposed Generic Letter supplement lists "performance" during dynamic testing as a parameter to be used to compare for similarities between valves that are to be grouped. Using "performance" of valves during dynamic testing is inconsistent with the purpose of grouping. Normally, grouping is used to justify the use of test results of similar valves in order to reduce unnecessary testing or to demonstrate operability of each valve that is not practicable to test in situ. In both of these instances, there will only be dynamic test results on those valves that can be tested or those that are chosen to be tested. For those valves that are not being tested, using valve dynamic "performance" to compare for similarities is not possible. In other words, there is no valve dynamic "performance" information for untested valves.

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Static Test Acceptance (Page 6 of the Enclosure, Item 1, First Bullet)

The Commission recommends that both available thrust and torque should be within the window defined by the licensee design-basis calculations and margins. In accordance with the relevant BWR Owner's Group MOV Technical Resolution Group position, this recommendation should be changed to reflect that not all licensees are measuring both thrust and torque. The enclosure should be revised to reflect that licensees must take sufficient data to demonstrate compliance with their design-basis calculations and margins.

Static Test Acceptance (Page 6 of the Enclosure, Item 1, Second Bullet) and
Differential Pressure Test Acceptance (Page 7 of the Enclosure, Item 2, Fourth Bullet)

The Commission recommends that static/diagnostic traces should not indicate any significant abnormalities or anomalies in a valve prior to returning the valve to service. These bullets should be revised to indicate that the static/diagnostic traces do not indicate any gross abnormalities or anomalies that indicate a challenge to operability. These bullets as they currently read should be placed under the post-return to service section of the enclosure. This would change the emphasis on the pre-return to service from a full and complete analysis of the static/diagnostic traces to a less comprehensive review for obvious problems that would clearly bring valve operability into question. Some utilities have spent months analyzing MOV traces to determine subtle problems in the actuator or valve. As another option, the word "significant" could be more clearly defined to indicate those abnormalities or anomalies that challenge operability.

Very truly yours,



B. Ralph Sylvia
Exec. Vice President-Nuclear

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