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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388

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 BUTLER, W.R. Project Directorate I-2

SUBJECT: Provides initial response to Generic Ltr 89-10,  
 "Safety-Related Motor-Operated Valve testing...."

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Pennsylvania Power & Light Company

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Harold W. Keiser  
Senior Vice President-Nuclear  
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Director of Nuclear Reactor Regulation  
Attention: Dr. W. R. Butler, Project Director  
Project Directorate I-2  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
INITIAL RESPONSE TO GENERIC LETTER 89-10  
PLA-3311 FILE R41-2

Docket Nos. 50-387  
and 50-388

Dear Dr. Butler:

The purpose of this letter is to provide our initial response to NRC Generic Letter 89-10 "Safety-Related Motor-Operated Valve Testing and Surveillance." We will be in a better position to provide the details of and our justifications for testing and/or limiting testing by June 1990 when our program description and schedule will be available for review. Our preliminary assessment is summarized as follows.

In order to maintain and operate Susquehanna Steam Electric Station (SSES) in a safe and reliable manner we have invested resources in programs such as predictive and preventive maintenance, the MOVATS program for valve testing, review of industry events, and our valve improvement projects. As a further enhancement of our plans we will consider incorporating the Generic Letter recommendations and areas of concern into our program.

Our plan for meeting the Generic Letter recommendations will include participation in industry sponsored MOV testing programs geared toward assurance of MOV functioning, as well as continued pursuit of our own in-house programs currently established. We will make every effort to meet the 5-year schedule proposed in the Generic Letter, however our preliminary task plan indicates that the NRC proposed schedule is overly aggressive for the entire scope of the recommended actions. This is especially disconcerting for us given the numerous other regulatory initiatives with which we are currently faced.

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In general, we view the prescriptive approach outlined in the Generic Letter as augmenting what we currently do to demonstrate MOV operability. Therefore, our general thrust will be to create the design basis requested, and limit testing to those MOVs we determine need to be tested in order to prevent inadvertent failures and which offer the highest returns in safety significance.

Very truly yours,



H. W. Keiser

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S. Barber, NRC Sr. Resident Inspector  
Mr. M. C. Thadani, NRC Project Manager

11/11/66