

PRIORITY
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9505030153 DOC. DATE: 95/04/28 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388

AUTH. NAME AUTHOR AFFILIATION
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Rules & Directives Review Branch (Post 920323)

SUBJECT: Provides comments on proposed GL re pressure locking & thermal binding of safety-related power operated gate valves. Agressive schedules do not appear to be justified.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR Submittal: General Distribution

NOTES: 05000387

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	PD1-2 LA	1	PD1-2 PD	1
	POSLUSNY, C	1		
INTERNAL:	ACRS	6	FILE CENTER 01	1
	NMSS/DWM/LLDP	2	NRR/DE/EMCB	1
	NRR/DRCH/HICB	1	NRR/DSSA/SPLB	1
	NRR/DSSA/SRXB	1	NUDOCS-ABSTRACT	1
	OGC/HDS2	1		
EXTERNAL:	NOAC	1	NRC PDR	1
NOTES:		1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 21 ENCL ~~20~~ ⁰

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram
Senior Vice President—Nuclear
610/774-7502
Fax: 610/774-5019

APR 28 1995

Chief
Rules, Review and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON PROPOSED GENERIC LETTER
ON PRESSURE LOCKING AND THERMAL
BINDING OF SAFETY-RELATED
POWER-OPERATED GATE VALVES
PLA-4313**

FILE A48-2B

**Docket Nos. 50-387
and 50-388**

Dear Sir:

The purpose of this letter is to provide Pennsylvania Power & Light Company's comments on the proposed Generic Letter on pressure locking and thermal binding of safety-related power-operated gate valves.

Pennsylvania Power & Light Company supports those comments supplied by NEI on behalf of the industry. In addition PP&L has the following comments:

- The aggressive schedules (particularly the 60 days to screen all valves and document the bases for operability for all potentially susceptible valves and the 180 days to completion of the Required Response) do not appear to be justified since many utilities have previously performed susceptibility reviews, detailed evaluations, operability assessments, and corrective actions, including modifications. We realize that there may be some need for additional work based on the current understanding of the concerns; however, re-performing the previous analyses to finer criteria on such an aggressive schedule would add little value when compared to previous efforts. It is unlikely that high risk valves escaped the earlier extensive efforts. Therefore, the schedule for completion of final analyses to the new criteria should be more realistic and in line with the risk associated with this issue.

9505030153 950428
PDR ADDCK 05000387
P PDR

A001
1/0


24

201020

- The criteria for susceptibility to pressure locking and thermal binding are open-ended, in that it is unclear what would satisfy the proposed Generic Letter. The proposed Generic Letter does not provide closed-ended criteria for susceptibility. This creates the potential for regulatory "moving targets" that could cause significant expenditure of limited industry resources, with little corresponding increase in safety. We recommend that clear guidance on what valves are susceptible and the criteria to which these valves are evaluated be established prior to setting any schedule for completion of the evaluation of pressure locking and thermal binding effects on gate valves. The criteria should be developed by the industry and provided to the NRC for concurrence.
- An alternative approach to addressing the issue of pressure locking and thermal binding would be to address only the known risk-significant valves (such as low pressure ECCS injection valves, etc.). This would focus efforts where they are needed most, while avoiding the potential for "moving targets" and over extension of resources due to lack of hard criteria for susceptibility to the phenomena of concern.
- Attachment 2 to the Generic Letter suggests restrictions on the use of "Analysis Only" to justify actuator capability only for potential pressure locking of small valves, and not for larger valves, nor for potential thermal binding. This is not consistent with Attachment 1, item 2, which allows unrestricted analysis for both potential pressure locking and thermal binding, given that the evaluation includes "...consideration of the uncertainties surrounding the prediction of the required thrust to overcome these phenomena..." The Generic Letter should be revised to consistently allow analysis under this provision in Attachment 1.

If you have any questions, please contact us.

Very truly yours,



R. G. Byram

copy: Document Control Desk
NRC Region I
Ms. M. Banerjee, NRC Sr. Resident Inspector
Mr. C. Poslusny, NRC Sr. Project Manager

>



11-11-11

11-11-11