



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

September 24, 1992

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Mr. A.B. Davis
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Rd.
 Glen Ellyn, IL 60137

SUBJECT: MOV Testing
 NRC Docket Nos: 50-237, 50-249, 50-254, 50-265, 50-295, 50-304,
 50-373, 50-374, 50-454, 50-455, 50-456, 50-457.

REFERENCE: April 8, 1992 Management Meeting on Generic Letter 89-10
 Implementation.

Dear Mr. Davis,

The referenced meeting was held to discuss Commonwealth Edison's (CECo's) implementation of Generic Letter 89-10 regarding testing of motor-operated valves (MOV's). The purpose of the meeting was to discuss CECo's resolution to several issues regarding the calculational assumptions and testing of provisions of CECo's MOV program. During this meeting, CECo committed to several actions.

Subsequent to CECo committing to this action, a potential Part 21 report was issued calling into question the validity of the VTC results.

The purpose of this letter is to notify the NRC that, due to the outstanding potential Part 21 issue, the evaluation of VTC results will not be completed as scheduled. The attachment to this letter summarizes CECo's action to date regarding our validation efforts, and the action plan to be implemented upon resolution of the potential Part 21 issue.

Please address any questions to this office.

Terrence W. Simpkin
 Terrence W. Simpkin
 Nuclear Licensing Administrator

cc: B. Clayton
 A.H. Hsia
 J.M. Jacobson

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INTRODUCTION

Commonwealth Edison and the NRC held a Management Meeting at Region III Headquarters on April 8, 1992 to discuss issues related to CECo's implementation of the Generic Letter 89-10 Program. During that meeting and in subsequent correspondence with the NRC, CECo committed to a number of items with respect to the GL 89-10 Program. From the list, the following two commitments were made with respect to evaluation of MOV test data taken during the initial static and dynamic testing performed by CECo:

1. CECo will evaluate the results of initial VOTES Torque Cartridge (VTC) testing performed on MOVs since January, 1991 to validate CECo's stem friction coefficient assumptions. This evaluation will be done by August 31, 1992.
2. CECo will perform a preliminary evaluation of the test data obtained from initial MOV dP and static testing to ensure that all test data is appropriate for validating design assumptions. This preliminary evaluation will be completed by September 30, 1992.

Subsequent to these two commitments being made, CECo was informed of a potential 10CFR Part 21 notification concerning VOTES diagnostic equipment. VOTES is the system that CECo has utilized to perform MOV diagnostic testing and evaluation at all of CECo's stations. Since notification of the potential Part 21, CECo has been aggressively pursuing resolution of the issues surrounding the VOTES equipment in conjunction with the vendor. Given the potential impact of the potential Part 21 on the VOTES test data values, CECo is not able to complete our commitments as stated above and we are requesting scheduler relief from the NRC.

The remainder of this letter summarizes CECo's action completed to this date and provides you with a revised schedule for completion of our commitments.

ACTIONS TAKEN TO DATE

A database of all CECo VOTES tests has been established. This database will be utilized in the analysis process. To evaluate the impact of the potential Part 21 on the VOTES test data, CECo has catalogued the following additional information for the MOVs that have been tested with the VOTES equipment:

- type of calibration clamp
- placement of calibration clamp
- location of anti-rotation devices
- as left test number and date

In addition, we determined that no long cable concerns existed for the MOV tests. This eliminates one of the issues related to the potential Part 21 notification.

In the MOV test database, the tested MOVs have been grouped by stem geometry, stem material, and calibration clamp location. Margins available were also determined based on Control Switch Trip (CST) thrust, target window, valve/actuator structural limits, and final thrust for each test. We are currently in the process of evaluating all of the groups. The groups for which the highest expected impact from the Part 21 torsion and stem material effect and the least amount of margin will be evaluated first (prioritization) once Version 2.3 of VOTES is released for controlled use. In addition, VTC and differential pressure tests will receive a high priority to expedite validation of stem and valve factor assumptions. Version 2.3 of VOTES is expected to be released for controlled use in the very near future and this version is expected to correct the problems associated with the potential Part 21 notification. Software validation by CECo will take approximately two weeks after the release of the new version.

ACTIONS TO BE TAKEN ONCE VOTES VERSION 2.3 IS RELEASED

Phase 1 - Preliminary Evaluation and Validation of Diagnostic Test Data

The highest priority groups of MOVs will be reviewed first using the VOTES (V2.3) software. This review will be an iterative process to estimate the stem friction coefficient for each MOV that has been tested and then to determine the torsional impact on stem diameter when the valves were calibrated. The review team will consist of VOTES trained engineers. CECo estimates that Phase 1 will be completed within 3 months of initial utilization of the V2.3 VOTES software.

Phase 2 - Resolution of Problems Resulting from VOTES Software Open Issue

The results of the Phase 1 evaluation will be provided to a second engineering team for evaluation in an ongoing basis. THIS evaluation team will compare test performance to target thrust windows and MOV structural limits. Any identified problems or discrepancies found during the Phase 1 work will be dispositioned using the appropriate CECo QA procedures. CECo will ensure that this Phase 2 evaluation keeps pace with the Phase 1 effort so that all valves are dispositioned consistent with the safety significance of the identified problems.

Phase 3 - Evaluation of Results of VTC and dP Valve Testing

A third engineering team will evaluate the validated VTC and dP test data for consistency with design basis assumptions (i.e. stem friction factor and valve factor). These evaluations are expected to be completed within four months of the release of the VOTES (V2.3) software.