



August 24, 1998

U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Document Control Desk

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Dresden Nuclear Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

LaSalle County Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Subject: NRC Generic Letter 96-05, "Periodic Verification of Design Basis Capability of Safety-Related Motor-Operated Valves," Additional Information

- References:
- (1) Generic Letter 96-05, "Periodic Verification of Design Basis Capability of Safety-Related Motor-Operated Valves," dated September 18, 1996
  - (2) Letter from J. Hosmer (ComEd) to U.S. NRC, "ComEd 180-day Response to GL 96-05," dated March 15, 1997
  - (3) Letter from T. Essig (U.S. NRC) to T. Rausch (Boiling Water Reactor Owners Group), "Safety Evaluation on Joint Owners Group NRC Safety Evaluation on Joint Owners Group Program on Periodic Verification of Motor-Operated Valves Described in Topical Report NEDC-22719 Revision 2 dated October 30, 1997

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In Reference 1, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 96-05, "Periodic Verification of Design Basis Capability of Safety-Related Motor Operated Valves." The Commonwealth Edison (ComEd) Company responded to this GL in Reference 2. On July 30, August 6 and August 12, 1997, respectively, the Boiling Water Reactor Owners Group (BWROG), Combustion Engineering Owners Group (CEOG) and the Westinghouse Owners Group (WOG) submitted Topical Report NEDC-32719, "BWR Owners Group Program on Motor-Operated Valve (MOV) Periodic Verification," Revision 2. On October 30, 1997, the NRC issued the Safety Evaluation (SE) (Reference 3), which within the conditions and limitations described in the SE, stated that the NRC considers the JOG program on MOV periodic verification to be an acceptable industry-wide response to Generic Letter (GL) 96-05. The JOG had committed that after the issuance of the SE, requests would be made for participating utilities to notify the NRC of their plans to implement the JOG program described in NEDC-32719, Revision 2 and that any deviations from the JOG program would be justified.

By this letter, ComEd is providing the committed notification. ComEd plans to fully participate in the JOG MOV-Periodic Verification Program as a member of the BWROG and plans to implement the program elements described in Topical Report NEDC-32719, Revision 2.

In Reference (2), ComEd committed to participate in the JOG Program, while continuing to implement the ComEd Periodic Verification Program that had been presented to the NRC during the GL 89-10 closure inspections. Reference (2) committed to evaluate lessons learned during the JOG Program and incorporate them into the ComEd program, where applicable. The following supercedes Reference (2). ComEd commits to implement the JOG Program in its entirety. ComEd is revising technical position papers and program documents to be in full agreement with the JOG Program document with respect to margin requirements and testing frequencies. Aspects of GL 96-05 not covered by the JOG Program will continue to be implemented as follow.

- Maintenance activities, in particular stem lubrication, occur between periodic verification tests. ComEd will not prevent these activities from occurring immediately prior to periodic verification tests. Therefore, some MOV periodic verification tests will be performed in the as-left condition. ComEd will analyze the data from as-found tests to determine variability in stem factor between the as-left and the as-found condition. ComEd will verify that assumptions for stem lubrication variation used in MOV setpoints are appropriate.
- In general, newly installed MOVs and valves subjected to internal maintenance will be setup using grouping valve factors. If a measured valve factor is used rather than the grouping valve factor to setup an MOV under these conditions, a repeat Different Pressure (DP) test will be scheduled within 3 refueling outages of the baseline DP test, regardless of apparent margin.

- ComEd MOV setpoint assumptions for uncertainties such as rate of loading uncertainty and stem factor variability that are not addressed by the JOG Program will be evaluated by ComEd using ComEd data. This evaluation will be completed within the same time frame as the JOG effort. Results of this evaluation will be documented in technical position papers and incorporated into MOV setpoints, as needed.
- As required by the JOG Program, ComEd will review its safety related MOV population within the Generic Letter 89-10 program to determine whether any MOVs are not covered by the JOG Program. ComEd will independently evaluate the adequacy of these MOVs setup with respect to valve factor degradation within the same time frame as the JOG effort which is expected to be completed by 2002.

If you have any questions concerning this correspondence, please contact Denise Nemanich at (630)663-7283.

Respectfully,



R.M. Krich

Vice President - Regulatory Services

cc: Regional Administrator - NRC Region III  
Senior Resident Inspector - Braidwood Station  
Senior Resident Inspector - Byron Station  
Senior Resident Inspector - Dresden Nuclear Power Station  
Senior Resident Inspector - LaSalle Nuclear Power Station  
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