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SUBJECT: Comment on proposed suppl 6 to GL 89-10, "Info on Schedule & Grouping & Staff Responses to Addl Public Questions."
 Endorses NUMARC comments.

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Arizona Public Service Company
PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

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PDR PR
MISC 58FR39572 PDR

102-02614-TRB/RAB/SAB
August 23, 1993

Chief, Rules and Directives Review Branch
U. S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, DC 20555

Dear Sir:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Proposed Supplement 6 to Generic Letter 89-10
File: 93-010-026; 93-180-419

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OFFICE OF INSPECTION
USNRC

On July 22, 1993, the Nuclear Regulatory Commission (NRC) published for comment, in the Federal Register, proposed Generic Letter 89-10 Supplement 6 "Information on Schedule and Grouping, and Staff Responses to Additional Public Questions." Arizona Public Service Company (APS) is pleased to provide the comments contained in the enclosure to this letter. APS also endorses the comments provided by the Nuclear Management and Resources Council (NUMARC).

Should you have any questions, please contact James F. Minnick, Manager, Valve Services at (602) 393-6898.

Sincerely,



Thomas R. Bradish, Manager
Nuclear Regulatory Affairs

TRB/RAB/SAB/bcf

cc: C. M. Trammell

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ENCLOSURE

**COMMENTS ON PROPOSED SUPPLEMENT 6
TO GENERIC LETTER 89-10**

Comments on Proposed Supplement 6
to Generic Letter 89-10

Arizona Public Service Company requests your consideration of the following comments in the development of the final version of Generic Letter 89-10 Supplement 6 "Information on Schedule and Grouping, and Staff Responses to Additional Public Questions."

1. GL 89-10 Schedule -- In the second paragraph of this section it states: "As a minimum, the staff expects all licensees to have their valves set up with the best available industry data by the original completion date accepted by the staff, whether or not all testing has been completed." It needs to be recognized that new data is coming available at a continuous rate and there is some lag time between when that data becomes available and when actual valve setpoints can be adjusted accordingly. It will not be possible for a licensee to have the best available data factored into the actual valve setpoints on the original completion date since the technology is evolving so rapidly. It is recommended that the sentence quoted above be modified to account for this concern.
2. Motor Operated Valve (MOV) Grouping -- As an additional consideration under the general topic of grouping and scope reduction, serious consideration should be given to reducing the dynamic/differential pressure testing requirements for those MOVs which have relatively low design basis functional requirements and rather large as-built capability (i.e., significant margin in the equipment). The first reason for this is that the data obtained from dynamic testing under low demand conditions, with the available state-of-the-art diagnostic equipment, is more influenced by data error than signal base. Secondly, with sufficient available actuator margin (i.e., a factor of two or more in thrust and torque), there is little point in dynamic testing for specific data values. A dynamic test may be recommended to assure the valve does not have any anomalies under load. Once that is confirmed, however, no data evaluation should be required and subsequent reverification testing need only be static tests.

In addition, dynamic testing of non-rotating stem globe valves to date seems to be showing that the industry standard thrust/torque analytical evaluation is valid. Therefore, consideration should be given to eventually eliminating this class of MOV from differential pressure/flow testing requirements. Test data indicates that adding a conservatism of about 25 percent to the industry standard analytical evaluation for the minimum thrust and torque requirements would be more than sufficient for this class of MOV.

3. Enclosure -- In the NRC staff response to the issues regarding scope and the use of PRA studies in prioritizing MOVs, it is stated in the first paragraph that "...a licensee might determine that the scope of MOVs to be dynamically tested may

be reduced by eliminating MOVs in hard-piping ventilation systems with low design-basis differential pressure in which static loads are significant compared to dynamic loads". Furthermore, in the sixth paragraph of this section, it is stated that "...the staff eliminated MOVs in sheet-metal ducting systems because static running loads would likely be significant compared to dynamic loads." It is the suggestion of APS that dynamic testing be eliminated for any MOVs with low design basis differential pressure in which static loads are significant compared to dynamic loads. This would allow for the elimination of dynamic testing for MOVs in systems such as Hydrogen Monitoring where there is a low design basis differential pressure and in which the static loads are significant compared to the dynamic loads.



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