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SUBJECT: Forwards response to GL 95-07, "Pressure Locking & Thermal Binding of Safety-Related Power-Operated Gate Valves."

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NOV - 3 1995

William R. Robinson
Vice President
Harris Nuclear Plant

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

Serial: HNP-95-096
10 CFR 50.54(f)

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
GENERIC LETTER 95-07, "PRESSURE LOCKING AND THERMAL BINDING OF SAFETY-RELATED POWER-OPERATED GATE VALVES"
60-DAY RESPONSE FOLLOW UP

Gentlemen:

On August 17, 1995, the NRC issued Generic Letter (GL) 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves." The generic letter requested that each licensee provide a written response within 60 days, indicating their intentions for implementing the requested actions. On October 16, 1995, Carolina Power and Light Company's Harris Nuclear Plant (HNP) informed the NRC of our intention to attend the NRC's GL 95-07 meeting on October 24, 1995 in Atlanta, Georgia and then provide a follow up response within 10 days indicating our plans for implementing the generic letter requested actions. The NRC meeting was helpful in formulating the HNP response to GL 95-07. The enclosure provides HNP's implementation plans. If you have any questions or need additional information regarding this matter, please contact Mr. T. D. Walt at (919) 362-2711.

Sincerely,

W R Robinson

W. R. Robinson, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Darlene S. Yarborough
Notary (Seal)

My commission expires: 2-6-2000

DARLENE S. YARBOROUGH NOTARY PUBLIC HARNETT COUNTY, NC

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Nuclear Records
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File: H-X-545

GL 95-07 Requested Actions:
Within 90 days of the date of this generic letter, each addressee of this generic letter is requested to perform and complete the following actions:

1. Perform a screening evaluation of the operational configurations of all safety-related power-operated (i.e., motor operated, air operated, and hydraulically operated) gate valves to identify those valves that are potentially susceptible to pressure locking or thermal binding; and
2. Document a basis for the operability of the potentially susceptible valves or, where operability cannot be supported, take action in accordance with individual plant Technical Specifications.

HNP Response:

1. Safety-related power-operated (motor, air or hydraulic) gate valves will be screened for potential susceptibility to PL/TB. This screening process will identify valves that are normally closed, but have an open safety position. Additionally, the Pressurizer PORV block valves will be included in the evaluation as requested by the generic letter.

2. A preliminary operability basis will be documented for each valve identified as potentially susceptible to PL/TB. This basis will be completed using engineering judgement and best methods available to provide confidence that the valves can adequately perform their intended safety function. As indicated at the October 24, 1995 NRC meeting, these are acceptable means of justification. If operability can not be supported, action will be taken in accordance with appropriate plant procedures and technical specification requirements.

The above 90-day requested actions will be completed by November 15, 1995.

GL 95-07 Requested Actions:
Within 180 days of the date of this generic letter, each addressee of this generic letter is requested to implement and complete the guidance provided in Attachment 1 (to the Generic Letter) to perform the following actions:

1. Evaluate the operational configurations of safety-related power-operated (i.e., motor-operated, air-operated, and hydraulically operated) gate valves in its plant to identify valves that are susceptible to pressure locking or thermal binding;
2. Perform further analyses as appropriate, and take needed corrective actions (or justify longer schedules), to ensure that the susceptible valves identified in 1 are capable of performing their intended safety function(s) under all modes of plant operation, including test configuration.

HNP Response:

1. The potentially susceptible valves identified during the initial screening will be further evaluated for the following operational configurations/conditions:
   - Normal at-power Operation.
   - Plant Start up (heat up) and Shutdown (cooldown)
   - Surveillance Testing
   - Design Basis Accidents (FSAR chapter 15)

   The evaluations will consider the following PL/TB situations:
   - Thermal binding when a valve is closed hot and experiences a significant cooldown.
   - Pressure locking when high pressure fluid could reasonably become trapped in the bonnet volume.
   - Pressure locking when the bonnet volume of a closed valve experiences a significant heatup.
   - Pressure locking when condensate could be trapped in the bonnet of a closed steam valve which then experiences a significant heatup.

2. Further analysis, testing and needed corrective actions will be completed or appropriately justified and planned for susceptible valves. A schedule for implementing corrective actions will be developed based on valve risk significance, refueling outage schedules, and other pertinent factors.

The above 180-day requested actions will be completed by February 13, 1996.

Generic Letter 95-07 also requested that the following information be submitted within 180 days of the date of the Generic Letter:

1. A description of the susceptibility evaluations and of any additional analyses which support a determination that valves are or are not subject to pressure locking or thermal binding (PL/TB).
2. The results of the susceptibility evaluations and further analyses.
3. The corrective actions or other dispositioning for valves identified as subject to PL/TB.

HNP Response:
The above requested items will be provided in summary form by February 13, 1996. In addition, a schedule for completion of any corrective actions that extends beyond 180 days will also be provided.