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**POWERING
MICHIGAN'S PROGRESS**

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

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1995 APR 31 PM 1:27

RULES REVIEW & DIR. BR.
USNRC

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

PALISADES PLANT - COMMENTS ON PROPOSED GENERIC LETTER: PRESSURE LOCKING AND THERMAL BINDING OF SAFETY RELATED POWER OPERATED GATE VALVES

On March 27, 1995, the NRC provided a new proposed Generic Letter in the Federal Register pertaining to the evaluation of the effects of pressure locking and thermal binding on power-operated safety-related gate valves. The submittal requested comments by 4/26/95 and a Palisades Plant review has created the following comment for your review,

1. Would it be possible for further guidance to be provided in the generic letter to cover the same areas of questions that arose from Generic Letter 89-10, including issues from Supplement 1, such as:
 - a. Evaluation of valves that are normally open, and must remain open for their safety function, but could conceivably be mispositioned inadvertently at the beginning of a postulated event, (mispositioning or position changeable valves) ?
 - b. Evaluation of valves in piping systems only ?
 - c. Definition of "safety-related" ?
 - d. Possible generic exclusion of safety-related power-operated valves in certain plant systems, like Service Water, Component Cooling Water, Chemical and Volume Control, or Concentrated Boric Acid Systems that have not experienced this historical phenomena ?
5. The use of degraded air system pressure evaluations, similar to degraded voltage effects for MOVs ?

Paul J. Gire

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