

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 16, 1995

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

Serial No. 95-438
NL&P/MAE: R1
Docket Nos. 50-280/-281
50-338/-339
License Nos. DPR-32/-37
NPF-4/-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
GENERIC LETTER 95-07 PRESSURE LOCKING AND THERMAL BINDING
OF SAFETY-RELATED POWER-OPERATED GATE VALVES

On August 17, 1995, the NRC issued Generic Letter 95-07, entitled "Pressure Locking and Thermal Binding Of Safety-Related Power-Operated Gate Valves." The NRC issued this generic letter to request that addressees perform or confirm that they previously performed, 1) evaluations of operational configurations of safety-related, power-operated (including motor-, air-, and hydraulically operated) gate valves for susceptibility to pressure locking and thermal binding and 2) further analyses, and any needed corrective actions, to ensure that safety-related power-operated gate valves that are susceptible to pressure locking or thermal binding are capable of performing the safety functions within the current licensing bases of the facility.

The generic letter has two requested actions. First, within 90 days, 1) identify the valves which are potentially susceptible to pressure locking and thermal binding and 2) document a basis for their operability. Second, within 180 days, 1) conduct an evaluation of susceptible valves and 2) perform further analysis and corrective actions with justification for longer implementation schedules as needed.

The responses required of utilities are: 1) a 60 day response describing the extent of intended implementation of the requested actions and associated schedule, or an alternate course of action as appropriate, and 2) a 180 day response documenting the second requested action by providing the following requested information:

1. Description of susceptibility evaluation, additional analysis, and the susceptibility criteria used.
2. Evaluation results, including a list of susceptible valves.
3. Corrective actions identified, schedules, and justifications of operability as appropriate.

In response to utilities' concerns about being able to provide timely and complete

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responses to the generic letter, the Westinghouse Owners Group (WOG) has developed a program to assist utilities in addressing the requirements of Generic Letter 95-07. In part, the program will establish a common set of criteria which can be applied in the screening and evaluation of the pressure locking and thermal binding phenomena. Most of the NSSS systems, as well as many of the valves in those systems, are common among the various Westinghouse plants. Thus, it is beneficial and cost effective, to both WOG members and the NRC, to utilize the expertise of the member utilities and Westinghouse to develop a consistent, effective, and comprehensive set of screening and evaluation criteria that can be used by all WOG plants. To this end, a task team of WOG members has been formed as a part of this program and is in the process of developing the criteria.

A set of screening criteria will be defined to identify valves potentially susceptible to pressure locking and thermal binding, taking into account both component and systems considerations. Criteria and methodology are also being developed to assist in determining the impact on safety function capability for each valve determined to be potentially susceptible to pressure locking and thermal binding. Once the criteria have been established, each utility can apply the criteria to its own population of safety-related, power-operated gate valves. As potentially susceptible valves are identified, the evaluation criteria and methodology will be used to determine the impact on valve safety function capability.

Because of the importance in completing further evaluations to determine what effect pressure locking and thermal binding may have on valve operability, it is felt that the resources can be more appropriately and productively focused on meeting the requested 180 day actions, and waive the requested 90 day action. The WOG Task Team has established an aggressive schedule for the criteria development for valves potentially susceptible to pressure locking and thermal binding. Even with this aggressive schedule, operability assessment efforts will be most effective if they are concentrated on those valves for which long term safety function capability is not demonstrated. If at any time during the evaluation process, a valve is determined to be incapable of performing its safety function, an operability assessment will be made and a justification of continued operability developed. If operability cannot be demonstrated, the applicable Technical Specification actions will be followed.

Virginia Electric and Power Company will comply with the actions and responses specified in the 180 day required response. These include completion and documentation of the following:

- Screening criteria
- List of susceptible valves
- Description of evaluations
- Susceptibility evaluation results
- Corrective actions taken or scheduled

- Justifications for continued operability, as needed

These actions will be completed and the responses provided to the NRC within 180 days of the date of Generic Letter 95-07. If you have any questions, please contact us.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

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