VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 21, 1990

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

Serial No. 90-446
NL&P/RMN
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
PORV AND BLOCK VALVE RELIABILITY
RESPONSE TO GENERIC LETTER 90-06

We have received Generic Letter 90-06 dated June 25, 1990 on the above subject. The letter asked for action concerning quality assurance, inservice testing and Technical Specifications for PORVs and block valves. Our response to the recommendations is provided in the Attachment.

If you have any questions or require additional information, please contact us.

Very truly yours,

R F Saunders

for W. L. Stewart
Senior Vice President - Nuclear

Attachment

A019
1/1

cc: U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

Mr. W. E. Holland
NRC Senior Resident Inspector
Surry Power Station

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by R. F. Saunders, who is Assistant Vice President - Nuclear Operations, for W. L. Stewart who is Senior Vice President - Nuclear, of Virginia Electric and Power Company. He is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 21ST day of December, 1990.

My Commission Expires: May 31, 1994.

Vicki L. Hull
Notary Public

(SEAL)

ATTACHMENT

VIRGINIA ELECTRIC AND POWER COMPANY

RESPONSE TO GENERIC LETTER 90-06

VIRGINIA ELECTRIC AND POWER COMPANY
RESPONSE TO GL 90-06

Enclosure A-1 Improvements

1. **Include PORVs and block valves within the scope of an operational quality assurance program that is in compliance with 10 CFR 50, Appendix B. This program should include the following elements:**

   a. **The addition of PORVs and block valves to the plant operational Quality Assurance List.**

   Response:

   The PORVs and block valves are included in a quality assurance program that meets 10 CFR 50, Appendix B requirements. These valves are on the plant operational Quality Assurance list (Q-List).

   b. **Implementation of a maintenance/refurbishment program for PORVs and block valves that is based on manufacturer's recommendations or guidelines and is implemented by trained plant maintenance personnel.**

   Response:

   The maintenance program for PORVs and block valves is based on manufacturer's recommendations and guidelines. Valve maintenance is performed by trained personnel.

   c. **When replacement parts or spares, as well as complete components, are required for existing non-safety-grade PORVs and block valves (and associated control systems), it is the intent of this generic letter that these items may be procured in accordance with the original construction codes and standards.**

   Response:

   Spare or replacement parts are procured in accordance with the original construction codes and standards or applicable later editions of the code.

2. **Include PORVs, valves in PORV control air systems, and block valves within the scope of a program covered by Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants," of ASME Boiler and Pressure Vessel Code. Stroke testing of the PORVs should only be performed during Mode 3 (HOT STANDBY) or Mode 4 (HOT SHUTDOWN) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. Stroke testing of the PORVs should not be performed during power operation. Additionally, the PORV block valves should be included in the licensees' expanded MOV test program discussed in NRC Generic Letter 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance," dated June 28, 1989.**

Response:

North Anna

The PORVs and the block valves are included in the scope of the IST (Section XI) program. The block valves are included in the Generic Letter 89-10 MOV program. The solenoid operated valves and check valves in the PORV control air system are checked indirectly when the PORVs are tested.

In accordance with our approved Section XI inservice testing program, the PORVs are not tested at power, but are stroke tested on approach to each cold shutdown. In addition, the PORVs are stroke tested prior to each startup before establishing water-solid conditions. Therefore, the PORVs are tested prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. The remainder of the Section XI requirements are completed in cold shutdown.

Surry

The PORVs and the block valves are included in the scope of the IST (Section XI) program. The block valves are included in the Generic Letter 89-10 MOV program. The solenoid operated valves in the PORV control air system are checked indirectly when the PORVs are tested. The check valves in the PORV control air system are being added to a valve test program and will be tested during the next refueling outage.

In accordance with our approved Section XI inservice testing program, the PORVs are not tested at power, but are tested on approach to each cold shutdown. In addition, the PORVs are tested prior to each startup before establishing water-solid conditions. Therefore, the PORVs are tested prior to establishing conditions where the PORVs are used for low-temperature overpressure protection.

3. **For operating PWR plants, modify the limiting conditions of operation of PORVs and block valves in the Technical Specifications for Modes 1, 2, and 3 to incorporate the position adopted by the staff in recent licensing actions. Recent Technical Specifications require that plants that run with the block valves closed (e.g., due to leaking PORVs) maintain electrical power to the block valves so they can be readily opened from the control room upon demand. Additionally, plant operation in Mode 1, 2, and 3 with PORVs and block valves inoperable for reasons other than seat leakage is not permitted for periods of more than 72 hours.**

Response:

North Anna

The MERITS Technical Specifications meet the intent of the suggested Technical Specification for modes 1, 2, and 3 in the Generic Letter. MERITS Technical Specification were submitted for North Anna on March 15, 1990. Therefore, we do not propose to provide an amendment to the Technical specifications.

Surry

Surry will provide a Technical Specification change that incorporates a new Limiting Condition for Operation and associated Action Statements in accordance with the intent of the Generic Letter. The proposed amendment to the Technical Specification will be submitted by the end of the Unit 2 Refueling Outage currently scheduled to begin in April 1991.

Enclosure B-1 Technical Specifications changes

1. **Provide a statement as to whether a Technical Specification amendment will be submitted to incorporate the the modified Technical Specifications for the low-temperature overpressure protection system in Modes 5 and 6.**

   Response:

   North Anna

   The North Anna MERITS Technical Specifications for low temperature overpressure protection meet the intent of the suggested Technical Specification in the Generic Letter, with the exception of the allowed outage time for the PORVs in modes 5 and 6. The Generic Letter recommends a 24 hour allowed outage time, whereas MERITS provides a 7 day allowed outage. MERITS Technical Specifications were submitted for North Anna on March 15, 1990. Therefore, we do not propose to provide an amendment to the Technical Specifications.

   Surry

   Surry will provide a Technical Specification change that modifies the Limiting Condition for Operations and associated Action Statements for the PORVs and block valves to be consistent with the North Anna MERITS Specifications. The proposed amendment to the Technical Specification will be submitted by the end of the Unit 2 Refueling Outage currently scheduled to begin in April 1991, pending resolution of the allowed outage time for PORVs in modes 5 and 6.