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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

July 1, 1980

Mr. D. Louis Peoples Director of Nuclear Licensing Commonwealth Edison Company Post Office Box 767 Chicago, Illinois 60690

Dear Mr. Peoples:

RE: SEP TOPIC TIL-10.A THERMAL OVERLOAD PROTECTION FOR MOTORS OF MOTOR OPERATED VALVES

Enclosed is a copy of our evaluation of Systematic Evaluation Program Topic III-10.A, Thermal Overload Protection for Motors of Motor Operated Valves. This assessment compares your facility, as described in Docket No. 50-10 with the criteria currently used by the regulatory staff for licensing new facilities. Please inform us if your as-built facility differs from the licensing basis assumed in our assessment.

We have discussed this assessment with your staff and believe the facts concerning your plant are correct. Therefore, our review of this topic is complete and this evaluation will be a basic input to the integrated safety assessment for your facility unless you identify changes needed to reflect the as-built conditions at your facility. This topic assessment may be revised in the future if your facility design is changed or if NRC criteria relating to this topic are modified before the integrated assessment is completed.

Sincerely,

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 Division of Licensing

Enclosure: Completed SEP Topic III-10.A

cc w/enclosure: See next page cc w/enclosure: Isham, Lincoln & Beale Counselors at Law One First National Plaza, 42nd Floor Chicago, Illinois 60603

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SEP TECHNICAL EVALUATION TOPIC III-10.A

THERMAL-OVERLOAD PROTECTION FOR MOTORS OF MOTOR-OPERATED VALVES

DRESDEN 1

TOPIC III-10.A Thermal-Overload Protection for Motors of Motor-Operated Valves

The objective of this review is to provide assurance that the application of thermal-overload protection devices to motors associated with safety-related motor-operated valves do not result in needless hindrance cathe valves to perform their safety functions.

In accordance with this objective, the application of either one of the two recommendations contained in Regulatory Guide 1.106, "Thermal-Overload Protection for Electric Motors on Motor-Operated Valves," is adequate. These recommendations are as follows:

- (1) Provided that the completion of the safety function is not jeopardized or that other safety systems are not degraded, (a) the thermal-overload protection devices should be continuously bypassed and temporarily placed in force only when the valve motors are undergoing periodic or maintenance testing, or (b) those thermaloverload protection devices that are normally in force during plant operation should be bypassed under accident conditions.
- (2) The trip setpoint of the thermal-overload protection devices should be established with all uncertainties resolved in favor of completing the safety-related action. With respect to those uncertainties, consideration should be given to (a) variations in the ambient temperature at the installed location of the overload

protection devices and the valve motors, (b) inaccuracies in motor heating data and the overload protection device trip characteristics and the matching of these two items, and (c) setpoint drift. In order to ensure continued functional reliability and the accuracy of the trip point, the thermal-overload protection device should be periodically tested.

In addition, the current licensing criteria require that:

(3) In MOV designs that use a torque switch to limit the opening or closing of the valve, the automatic opening or closing signal should be used in conjunction with a corresponding limit switch.

DISCUSSION

On May 31, 1977, Commonwealth Edison stated that overload trips of essential equipment for HPCI and ESAP systems would be bypassed under LOCA conditions. A Review of a sample of Dresden 1 drawings indicates that these bypasses have been incorporated. However, for the valves examined, valve travel is terminated by a torque switch rather than a limit switch.

EVALUATION

Thermal-overload protection for motor-operated valves at Dresden 1 does not comply with current licensing criteria. While thermal-overload devices for ESF valves are bypassed under LOCA conditions, torque switches rather than limit switches are used to terminate valve travel.

REFERENCES

 IEEE Standard 179-1971, "Criteria for Protection Systems for Nuclear Power Generating Stations."

- 2. Branch Technical Position EICSB-27, "Design Criteria for Thermal Overload Protection for Motors of Motor-Operated Valves."
- Regulatory Guide 1.106, "Thermal Overload Protection for Electric Motors on Motor-Operated Valves."
- 4. Letter, Commonwealth Edison (Turbak), to DOR (Davis), dated May 31, 1977.
- 5. Dresden 1 Drawing 12E-1420A, Revision B, dated 12-4-78.
- 6. Dresden 1 Drawing 12E-1420B, Revision B, dated 12-4-78.
- 7. Dresden 1 Drawing 12E-1421A, Revision B, dated 12-4-78.
- 8. Dresden 1 Drawing 12E-1421B, Revision B, dated 12-4-78.