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DEC 2 7 1972

Docket No. 50-313

Mr. J. D. Phillips Vice President & Chief Engineer Arkansas Power & Light Company Sixth and Pine Streets Pine Bluff, Arkansas 71601

Dear Mr. Phillips:

In almost every analysis of a nuclear power plant accident, safe recovery from the accident or containment of radioactive materials depends on the proper function of active valves. In many cases these valves would be required to operate properly while at high temperature, against maximum pressure differentials, and while subjected to a severe accident or seismic vibratory environment. The number of valve maifunctions that have been encountered during inservice tests in aperating plants, suggests that we have not yet established adequate preservice and inservice test programs to assure the operability of active valves. In this light we have reviewed your response to our Request for Information 4.32, as it applies to active valves, and have concluded that the limited dynamic analytical and testing procedures used to confirm the operability of all active valves as specified are insufficient.

An acceptable program would be in-situ valve testing where the operability of valves is demonstrated in the plant during the preoperational testing of those systems designed to Seismic Category I criteria. Tou are requested to provide as an Amendment to your Application, the details of such a program which would demonstrate operability under normal system operation, as well as under superimposed loading, that appropriately simulate seismic vibratory responses, and accident (LOCA) vibratory responses, as applicable to the system. This program may include either the application of vibratory devices to superimpose the vibratory seismic and accident loadings or an equivalent combination of analytical and testing methods that confirm operability. The test program may be based upon selectively testing a representative number of active valves in the piping system according to valve type, seismic and accident load level, size, etc. on a prototype basis.

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Because of the scope and the generic nature of the program requested, you are invited to discuss this request with the AEC staff at the earliest opportunity.

Sincerely,

Original Signed by H. C. DeYoung

R. C. DeYoung, Assistant Director for Pressurized Water Reactors Directorate of Licensing

cc: Horace Jewell, Esquire House, Holms & Jewell 1550 Tower Building Little Rock, Arkansas 72201

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