



**Wisconsin
Electric**
POWER COMPANY

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VPNPD-89-661
NRC-89-160

December 15, 1989

U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Mail Station Pl-137
Washington, DC 20555

Gentlemen:

DOCKETS NOS. 50-266 AND 50-301
RESPONSE TO GENERIC LETTER NO. 89-10
SAFETY-RELATED MOTOR-OPERATED VALVE TESTING AND SURVEILLANCE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

NRC Generic Letter No. 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance (Generic Letter No. 89-10) - 10 CFR 50.54(f)," dated June 28, 1989, directed that all licensees respond within six months of the date of the letter to the recommendations and schedule for action proposed in the attachment to the letter regarding testing and surveillance of safety-related motor-operated valves. If the dates and/or recommendations presented in the generic letter cannot or will not be met, licensees are required to inform the NRC of these concerns and provide a technical justification, including any proposed alternative action for their positions.

Wisconsin Electric Power Company intends to meet the five-year schedule identified in the generic letter for the MOV's included in the scope of Generic Letter 89-10 at our Point Beach Nuclear Plant. Wisconsin Electric Power Company intends to meet all of the recommendations discussed in the generic letter with the exception of Item c, regarding changing MOV switch settings and demonstrating operability, as noted below.

NRC Recommended Action:

Individual MOV switch settings should be changed, as appropriate, to those established in response to Item b. Whether the switch settings are changed or not, the MOV should be demonstrated to be operable by testing it at the design-basis differential pressure

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and/or flow determined in response to Item a. Testing MOVs at design-basis conditions is not recommended where such testing is precluded by the existing plant configuration. An explanation should be documented for any cases where testing with the design-basis differential pressure or flow cannot practicably be performed. This explanation should include a description of the alternatives to design-basis differential pressure testing or flow testing that will be used to verify the correct settings.

Each MOV should be stroke tested, to verify that the MOV is operable at no-pressure or no-flow condition events if testing with differential pressure or flow cannot be performed.

PBNP Implementation:

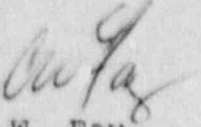
We propose to use an alternate means for testing the valves at Design Basis Accident conditions. PBNP currently utilizes a stem thrust signature test on the valves. This consists of a set of load cells mounted between the valve operator and the valve body, which provide an output voltage that is proportional to the load applied to the cells. This output voltage is monitored by computer and is digitally stored for the valve. The signature testing is used to identify problems like excessive packing load on valves at Point Beach. The NRC audit of the Point Beach Nuclear Plant Response to Generic Letter 85-03, which was conducted at Point Beach on August 15-18, 1988, found this method of signature testing to be an acceptable method of determining the correct switch settings for the motor operated valves.

The testing we propose is full differential pressure test on one valve out of a family of valves, which are valves of the same type, size and manufacturer-equipped with similar operators. The switch settings will be established and the full differential pressure test is performed for that one valve. A signature will be recorded for that valve operated at full differential pressure. A second signature test will be performed on that valve with no differential pressure. The balance of the valves in that family will be signature-tested at no differential pressure with the switch settings established similar to those for the fully-tested valve. Then, the signatures from the latter group of valves (those tested only at no differential pressure) will be compared to the signature of the valve tested with both no differential pressure and full differential pressure. A satisfactory comparison of the signatures at no differential pressure will verify operability. This method has been proven to be effective in the past when we have compared signatures from valves of the same family.

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We would be pleased to answer any questions you may have regarding the above information.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Copies to NRC Regional Administrator, Region III
NRC Resident Inspector

Subscribed and sworn to before me
this 18th day of December, 1989.

Gloria G. Monro
Notary Public, State of Wisconsin

My Commission expires: June 7, 1992

