



Nebraska Public Power District

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NLS8900469
December 28, 1989

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

Gentlemen:

Subject: Response to NRC Generic Letter 89-10, "Safety-Related
Motor-Operated Valve Testing and Surveillance"
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The Nebraska Public Power District (District) hereby provides its initial response to Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," dated June 28, 1989. Generic Letter 89-10 requests licensees to expand the scope of the motor-operated valve (MOV) testing and maintenance programs developed in response to the recommendations provided in NRC Bulletin 85-03 to include all safety-related MOVs, as well as position-changeable valves in safety systems. In accordance with 10 CFR 50.54(f), and Generic Letter 89-10, the District certifies that it will meet the intent and schedule of the program outlined in the Generic Letter, as qualified below.

The District is currently developing the scope and framework of its MOV testing program to meet the generic letter as it applies specifically to Cooper Nuclear Station (CNS). The District is also participating in the BWR Owner's Group (BWROG) effort to develop a generic technical basis for BWR MOV programs, and plans to use these efforts as a resource in the development of the CNS MOV program.

As part of its scoping process, the District intends to evaluate fully the legal, licensing, and safety implications of including in the MOV program motor-operated valves which appear to be within the scope of the generic letter, but which may be outside the design and licensing basis of CNS. This program scoping is currently being addressed generically by the Nuclear Management and Resources Council (NUMARC)², and has been a subject of discussion in recent BWR Owner's Group (BWROG) MOV Testing Subcommittee meetings. At this time, the District neither endorses nor reproves any preliminary positions taken by either of these groups, but intends to participate actively in the evaluation and resolution of this issue. The District may, upon further development of its program, exclude certain valves when justified within the CNS specific design basis.

1. Letter from S. D. Floyd (BWROG) to F. J. Miraglia, Jr. (NRC) dated October 30, 1989, "BWROG Owners' Group Response to Generic Letter 89-10."
2. Letter from T. E. Tipton (NUMARC) to Dr. T. E. Murley (NRC), dated November 17, 1989.

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Generic Letter 89-10 establishes a program completion schedule of five years or three refueling outages from the date of that letter, whichever is later. However, the NRC also acknowledges in the generic letter a certain lead time required for program development, and accordingly, exempts from the schedular requirements for program completion, refueling outages beginning within six months of the generic letter.

The next CNS refueling and maintenance outage is scheduled for March 1990. Although this outage falls beyond the six month exemption period, the District is not prepared to begin implementation of its testing program as the scope and framework of the District's MOV program is not yet fully developed. Therefore, the District will require an additional refueling outage to complete the required testing, which will extend completion of the District's response to Generic Letter 89-10 approximately six months beyond the allotted five year schedule.

The District's MOV program will require significant capital and labor expenditure to complete and involves many factors potentially beyond the District's control. Complete implementation of the CNS MOV program within the schedule established by the NRC will be contingent, in many respects, upon effective coordination of industry resources. The BWROG, NUMARC, the Electric Power Research Institute (EPRI), the Motor-Operated Valve Users Group (MUG), and the NRC are each sponsoring activities to facilitate the industry's response to this Generic Letter. The District intends to participate actively in the development of these programs and, accordingly, will apply the results of those efforts to the development and implementation of the CNS MOV program.

However, while evaluating the District's initial response to the Generic Letter, the NRC must recognize the magnitude of the effort required to respond to the Generic Letter 89-10 recommendations. Indeed, as discussed in Reference 1, the BWROG effort to develop the generic technical basis for BWR licensee response will not be completed until the end of 1990; and the District's identification of maximum expected pressures at design basis conditions will depend, to some extent, on the results of that effort. Therefore, the District cannot at this time provide a more definitive description of the CNS MOV program scope.

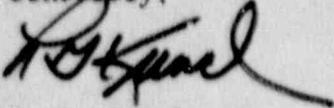
The District acknowledges the importance of assuring the successful operation of MOVs when called upon to operate under both normal operating and design basis conditions, and accordingly, will comprehensively and expeditiously address this issue as it applies to CNS. However, as discussed above, the District will evaluate fully, on a case by case basis, the impact on CNS safety of excluding certain valves from the scope of the CNS MOV program.

NLS8900469
U. S. Nuclear Regulatory Commission
Page 3 of 4
December 28, 1989

This response is submitted under oath in accordance with the requirements of
10 CFR 50.54(f).

Please contact me if you have any questions.

Sincerely,



L. G. Kunc1
Nuclear Power
Group Manager

LGK/mjb

cc: NRC Regional Office
Region IV
Arlington, TX

NRC Resident Office
Cooper Nuclear Station

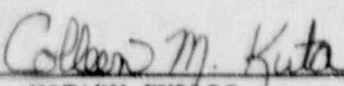
STATE OF NEBRASKA)
)
PLATTE COUNTY)

L. G. Kunc1, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this response on behalf of Nebraska Public Power District, and that the statements contained herein are true to the best of his knowledge and belief.



L. G. Kunc1

Subscribed in my presence and sworn to before me this 28th day of
December, 1989.



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