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December 28, 1989

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

PRairie Island Nuclear Generating Plant
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Response to NRC Generic Letter 89-10
Motor-operated Valve Testing and Surveillance

The purpose of this letter is to respond to Generic Letter 89-10.

The Prairie Island motor operated valve (MOV) program will implement the recommendations of Generic Letter 89-10 within the schedule proposed by the letter. The majority of the recommendations already exist in the program, but some refinements will need to be made.

The major difference between the program implemented for Bulletin 85-03 and the upgraded program recommended by Generic Letter 89-10 is a change in diagnostic equipment. The new equipment can accurately determine stem thrust for each MOV in both the open and close directions, thus eliminating a large unknown factor relating to stem friction. In-house procedures are being developed and technicians are being trained on the use of this diagnostic equipment.

To meet the recommendations of Generic Letter 89-10, the following will be performed:

- a. The design basis for each MOV is being established and documented. The methodology used to determine maximum differential pressures is identical to that used for Bulletin 85-03. The method is very conservative, often specifying pressures that are not testable. Some refinement may be needed for these extreme cases. This design basis review will be completed within the one year specified in the letter.

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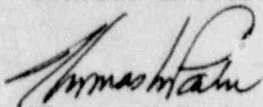
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- b. A review and update of the Prairie Island Motor Operated Valve Program, Procedure H5, will be performed. The program was initially established in response to Bulletin 85-03 and it has subsequently been expanded to cover all safety related MOVs. The program needs strengthening in the areas of differential pressure testing criteria and post maintenance testing with enhanced diagnostics. These program changes will be completed within the one year specified in the Generic Letter.
- c. Degraded voltage conditions need to be addressed in a two-stage process due to the installation of two new safeguards diesel generators at Prairie Island. The first stage, used to address the interim period until the new diesel generators are installed, will use a worst case enveloping approach to assure MOV performance. The second stage, which will address the completed diesel generator configuration, will evaluate each MOV individually to assure MOV performance. The first stage will be completed within the one year specified in the letter. The second stage will be completed in parallel with the diesel generator schedule (less than 5 years).
- d. Differential pressure testing will be performed to the extent practicable. It is recognized that a small group of valves cannot safely be tested at full design basis conditions. Justification for not testing these valves as well as alternate verification of the correct switch settings will be documented.
- e. Overall implementation of the items associated with design basis reviews, analyses, verifications, tests and inspections will be completed within the 5-year time period stipulated in the Generic Letter. MOVs will be prioritized by their safety significance and scheduled accordingly.

Please contact us if you require additional information related to the Generic Letter.



Thomas M Parker

Manager

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