

BOSTON EDISON

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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

BECO 90- 013
January 15, 1990

License DPR-35
Docket 50-293

**RESPONSE TO GENERIC LETTER 89-10
SAFETY RELATED MOTOR-OPERATED VALVE TESTING AND SURVEILLANCE**

Boston Edison is submitting the following response to Generic Letter 89-10. The Generic Letter requested that we advise you of our plan to implement the schedule and recommendations of the Generic Letter. This submittal is being made in accordance with the provisions of 10CFR50.54(f).

Boston Edison will develop a program in response to Generic Letter 89-10 which will enhance the maintenance, analysis and testing already being conducted on Motor Operated Valves (MOV's) at Pilgrim Nuclear Power Station (PNPS). Our plan is to begin a design basis review of MOV's in the first quarter of 1991 and to begin testing in RFO #9. It is anticipated that the testing will require three refueling outages. We are currently evaluating MOV diagnostic testing systems, including partially or wholly installed systems, for use in support of this testing. The Generic Letter 89-10 work scope has been incorporated into our Long Term Program (LTP item #487) and the schedule for GL 89-10 will be included in the next submittal of the LTP.

The Boiling Water Reactor Owner's Group (BWROG) is presently working on defining the scope of a MOV program compliant with the generic letter. The BWROG report is scheduled for November 1990. We will monitor the BWROG effort and factor the results into the Pilgrim test program as appropriate.

We implemented a MOV Upgrade Program at Pilgrim during RFO #7. That program consisted of both hardware and software upgrades. All Limitorque MOV's were inspected and refurbished where necessary. Additionally, station procedures were upgraded, controlled drawings were developed and MOV training programs were enhanced. Consistent with the guidance provided in Generic Letter 89-10, commitments made in response to IEB 85-03 will be incorporated into a test program developed to meet the recommended actions of Generic Letter 89-10. (See BECO Letter 87-183 dated November 13, 1987).

Pilgrim Station will perform Generic Letter 89-10 recommended testing to the fullest extent that is reasonably practical and which will neither place the plant in an unsafe condition or damage equipment. As recognized in the generic letter, in-situ design basis testing cannot be performed in many instances, for these cases, testing will be performed at reduced pressures and flows and the results will be evaluated for design basis conditions.

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BOSTON EDISON COMPANY

January 15, 1990

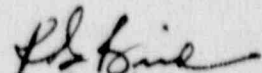
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The development of the program described in the generic letter will require the dedication of significant resources. There are many factors which may be beyond our direct control, including: the timely availability of valve documentation from vendors, plant conditions which prohibit full flow and full differential pressure testing, questions raised by an NRC sponsored testing program, such as, the validity of valve factors currently used in actuator sizing equations, and questions as to what constitutes an acceptable test. These factors will be considered in the scheduling of our program.

Also, ongoing discussions among NUMARC and the NRC concerning portions of Generic Letter 89-10 which may require a "backfit analysis" are pending resolution. Boston Edison will monitor these activities and incorporate the results into our final program scope and schedule as appropriate.

Should you or your staff have any questions regarding this response, please contact our Licensing staff.

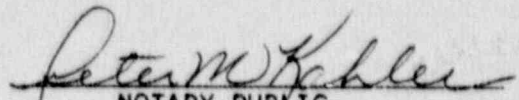

R. G. Bird

Commonwealth of Massachusetts
County of Plymouth

Then personally appeared before me, Ralph G. Bird, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My commission expires:

October 5, 1995
DATE


NOTARY PUBLIC

RAH/amm/3953

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