



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 13, 1990

Docket No. 50-219

Mr. E. E. Fitzpatrick
Vice President and Director
Oyster Creek Nuclear Generating Station
P. O. Box 388
Forked River, New Jersey 08731

Dear Mr. Fitzpatrick:

SUBJECT: RESPONSE TO GENERIC LETTER 89-10, "SAFETY-RELATED MOTOR-OPERATED VALVE (MOV) TESTING AND SURVEILLANCE" OYSTER CREEK NUCLEAR GENERATING STATION (TAC NO. 75693)

On June 28, 1989, the NRC issued Generic Letter (GL) 89-10 requesting the establishment of a program to ensure the operability of all safety-related MOVs under design basis conditions. The program in GL 89-10 significantly expands the scope of the program outlined in NRC Bulletin 85-03 and its supplement.

In accordance with the schedule provided in the GL, a description of your MOV program should be available for review by June 28, 1990, or the first refueling outage after December 28, 1989, whichever is later. Information that should be contained in your program description was discussed during the workshops held in September 1989. The staff positions on questions presented during the workshops will be issued in the form of a supplement to the GL. As your program is developed, justification for any differences between your program and the GL exemplified by the workshop comments should be incorporated into your program description.

On December 28, 1989, you submitted a response to Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," regarding the Oyster Creek Nuclear Generating Station. Therein, you commit to completing the initial program recommended in the generic letter within three refueling outages, with the exceptions outlined in your submittal. Several comments on your response are provided below.

In your December 28 submittal, you state that the existing MOV program relies on static tests to verify switch settings and that revisions to this approach will be made "when the industry developed databases indicate that different methodologies will yield more accurate results." Recent research results and operating experience have revealed that the performance characteristics of MOVs under static conditions are not necessarily indicative of MOV performance under design-basis conditions. Contrary to your apparent belief, the issue is not "more accurate results" but rather, the capability of the MOV to perform its safety function when needed. With the uncertainty in the analytical techniques to extrapolate test information from static to design-basis conditions, the staff recommends that licensees demonstrate that MOVs are capable of performing their safety functions by testing the MOVs in situ under design-basis conditions, where practicable. You will be expected to justify the method used to demonstrate this capability.

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You indicate that testing of MOVs in situ under design-basis conditions is impractical from a safety viewpoint. As discussed in Generic Letter 89-10 and at the workshops, licensees should develop alternatives to testing an MOV in situ under design-basis conditions, where this testing is not practicable. In cases where technical justification is inadequate to justify the alternative method the staff recommends that you consider using the "two-step" approach as outlined in the GL and discussed during the workshops.

Additionally, you indicated that the methodology for establishing valve similarity is key to justifying the application of test data from one MOV to another. With this knowledge, it would appear that you share the staff's concern regarding the use of static tests to demonstrate MOV operability under design-basis conditions.

You also state that "existing design margins which conservatively bound valve actuator sizing factors will be considered acceptable justification for not differential pressure testing unless proven otherwise." Research results and operating experience have raised doubts regarding the accuracy of the analytical techniques used to size actuators and to set switches. The staff's request that MOVs be tested in situ under design-basis conditions, where practicable, is based on such information. You will be expected to justify those instances where you believe that adequate margin exists to demonstrate MOV operability under design-basis conditions.

You propose to perform "in-situ full flow differential pressure tests only on those MOVs where this is possible without violating Technical Specifications or placing the plant systems in unsafe conditions." The staff agrees that placing the plant in an unsafe condition is not a good practice and that this justification would be appropriate for not performing in-situ design-basis testing. You should provide information regarding this testing scope in your program description along with any necessary justification. Your program description should be retained on-site for possible further NRC staff review.

Sincerely,

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