

NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

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Thomas E. Tipton
Vice President & Director
Operations, Management and
Support Services Division

February 22, 1994

AT
Mr. William T. Russell
Associate Director for Inspection
and Technical Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

RE: EPRI MOV Performance Prediction Program Topical Report

Dear Mr. Russell:

We are pleased to provide for formal NRC review and comment the initial sections of the EPRI MOV Performance Prediction Program Topical Report. And, as supplementary information only, we are providing the EPRI Friction Test Report. These initial sections and the report are being transmitted under a "Request for Withholding of Documents; 10 CFR 2.790(a)(4)," executed by EPRI with accompanying affidavit (Enclosure 1).

The initial sections of the topical report including the Cover Page, Abstract, Table of Contents, Sections 1 and 2 and Appendix A, (EPRI Report No. TR-103237) are provided as Enclosure 2. Enclosure 3 is the Friction Test Report, (EPRI Report No. 103119). Enclosure 4 is a listing of future reports that will be transmitted to you with the expected schedule.

It is EPRI's intention to provide a proprietary and a non-proprietary version of the final MOV Performance Prediction Program Topical Report. Only proprietary versions for reports submitted as supplementary information will be provided.

A list of the participating and non-participating utilities is provided as Enclosure 5. EPRI has transmitted Summary Flow Loop Test Results Reports to all US utilities. Also, in several open industry meetings EPRI and their research contractors have presented program findings including flow loop test results of valve factors as well as anomalous valve behavior. Although several aspects of the research are proprietary, it is important to note that the major insights resulting from this research have been shared and will continued to be shared with the entire industry.

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The major insights gained from our research have also been shared with your staff. NUMARC and EPRI hold quarterly meetings with the NRC staff to update them on the program progress and results. We assume any insights gained from the staff's detailed review of the topical report, both from review of the actual test data and methodology, will assist NRR and regional personnel in all their GL 89-10 inspections.

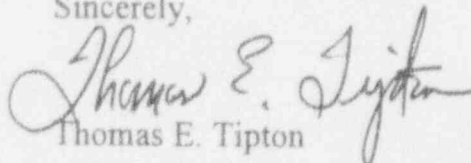
Because many issues that affect MOV performance are generic in nature and may be difficult for utilities to resolve individually, the NRC has encouraged the industry to develop industry wide programs to share information and address these issues. The results of this research program should standardize engineering assumptions used throughout the industry and help resolve many uncertainties regarding MOV sizing. This research should support many utilities in their efforts to close GL 89-10.

In a NUMARC letter (Enclosure 6) dated June 23, 1993, to Mr. Ronald M. Scroggins, Office of the Controller, US Nuclear Regulatory Commission, we detailed the background and purpose of the EPRI Topical Report. We requested advance NRC agreement that all costs incurred for review of the EPRI MOV Performance Prediction Program Topical Report and supplemental information be recovered through the annual charges assessed power reactor licensees pursuant to 10 CFR Part 171 and that staff issues a Safety Evaluation Report upon completion of their review. This request was based on the generic applicability of the EPRI research, both for the industry and the NRC. As of this date no response from the NRC has been received regarding our request. The purpose of this letter is to restate our request from the June 23, 1993, letter.

We would appreciate a prompt response to allow timely transmittal of the remaining research documents and data should you grant our request. If it is determined that our request regarding review fees cannot be granted, please notify me promptly as to the reasons so that further appropriate actions can be considered.

Should your staff or you have any questions regarding our request or the enclosures, please call Clive Callaway, Warren Hall or me.

Sincerely,


Thomas E. Tipton

TET/RCC
Enclosures