

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

December 4, 1990

Docket No. 50-416

Mr. William T. Cottle Vice President, Operations GGNS Entergy Operations, Inc. Post Office Box 756 Port Gibson, Mississippi 39150

Dear Mr. Cottle:

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 - RESPONSE TO GENERIC LETTER 89-10, "SAFETY-RELATED MOTOR-OPERATED VALVE TESTING AND SURVEILLANCE"

On September 5, 1990, the NRC staff held a meeting with representatives of Entergy Operations, Inc. (the licensee) to discuss the program being developed at Grano Gulf Nuclear Station in response to Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance." In a letter dated September 20, 1990, the staff summarized the results of that meeting and noted areas requiring additional attention. On October 1, 1990, you submitted a response to the staff's comments on your planned generic letter program and requested approval of an extension of the generic letter schedule. The staff has reviewed your submittal and provides the following comments.

The staff recognizes that it will not be practicable to test in situ all motoroperated valves (MOVs) within the generic letter program under design basis differential pressure and flow conditions. Therefore, the staff agrees with your conclusion that alternatives to design basis testing in situ will need to be found for cases where such testing is not practicable. Although you are currently planning to conduct only a sample of in situ flow tests, the staff believes that you should anticipate the need to expand the sample. As part of your program, the staff requests that you identify those MOVs for which testing in situ under design basis conditions is practicable and that you include specific justification for applying test data for instances where design basis testing will not be conducted. With respect to the justification provided in your submittal for use of a sampling/similarity approach, the staff agrees that your approach appears feasible, but will review the specific justification for applying test data between individual MOVs during inspections of your program.

The staff agrees that factors, such as the availability of applicable test data and personnel with experience to apply that data, the ability to demonstrate the performance similarity of MOVs, and the additional industry test data (e.g., the data planned to be obtained by the Electric Power Research Institute), are important to the successful completion of your thrust verification program. The staff will alert licensees to publicly-available information regarding MOV research programs in the U.S. and other countries, wherever possible.

In your submittal, you provided justification for an extension of the schedule in Generic Letter 89-10 for completion of the testing program (excluding the

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periodic verification of MOV switch settings) from five years (or three refueling outages) to six years (or four refueling outages). Your justification is based on the following considerations: (1) a large number of MOVs are included in your generic letter program (in excess of 250 MOVs), (2) for a large number of MOVs in the program, testing in situ under design basis conditions is not practicable, (3) an expectation that normal maintenance will require 20 percent of the MOVs in the program to have switch settings adjusted over the next five years, (4) test data from the EPRI program will not be available until 1993, and (5) MOVs in your generic letter program are being prioritized to focus on those requiring prompt attention. The staff agrees that extension of the generic letter schedule to include four refueling outages (June 30, 1995), is justified for Grand Gulf Unit 1.

Sincerely,

Lester L. Kinther, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects III, IV, and V Office of Nuclear Reactor Regulation

cc: See next page

Mr. W. T. Cottle Entergy Operations, Inc.

CC:

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Grand Gulf Nuclear Station

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Mr. W. T. Cottle

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Sincerely,

Original signed by:

Lester L. Kintner, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects III, IV, and V Office of Nuclear Reactor Regulation

cc: See next page

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