10 CFR 50.54(f)
GL 89-10

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS
955-65 CHESTERBROOK BLVD.
WAYNE, PA 19087-5691
(215) 640-6000

December 14, 1990

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Response to Generic Letter 89-10, Supplement 3,
"CONSIDERATION OF THE RESULTS OF NRC-SPONSORED
TESTS OF MOTOR-OPERATED VALVES"

Dear Sir:

In parallel with the NRC staff's activities leading to Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," the staff performed tests of motor-operated valves (MOVs) as part of an ongoing research effort. The NRC-sponsored tests were focused on valves typically used for containment isolation in the supply line to the High Pressure Coolant Injection (HPCI), Reactor Core Isolation Cooling (RCIC) or Reactor Water Clean-up (RWCU) systems at Boiling Water Reactor (BWR) plants. Because the test results indicated that sufficient thrust for opening and closing MOVs may not be predicted using standard industry calculations with typical friction factors, the NRC issued Supplement 3 to GL 89-10.

This letter provides Philadelphia Electric Company's 30-day response to GL 89-10, Supplement 3 (dated October 25, 1990) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2. BWR licensees were requested to notify the NRC within 30 days of receipt of GL 89-10 Supplement 3 that a plant-specific safety assessment report addressing, as a minimum, the factors described in GL 89-10 Supplement 3 was available on site for review. BWR licensees were also requested to notify the NRC of any MOVs that they

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believe to have deficiencies of greater safety significance than those used for containment isolation in the supply to the HPCI, RCIC or RWCU Systems or in the line to the isolation condenser. We received GL 89-10 Supplement 3 by U.S. Mail on November 14, 1990.

Of the twelve HPCI, RCIC and RWCU containment isolation MOVs at PBAPS Units 2 and 3, we have identified only two MOVs with potential deficiencies. Our review of PBAPS MOVs is continuing and the complete results will be addressed in our 120-day response to GL 89-10, Supplement 3. We have not identified any valves with deficiencies of greater safety significance than those in the HPCI, RCIC or RWCU Systems. There is no isolation condenser at PBAPS, Units 2 and 3.

We have performed a detailed, plant-specific safety assessment for PBAPS, Units 2 and 3 in a format similar to the generic assessments performed by the BWR Owners' Group and the NRC (Enclosures 1 and 2 of the GL Supplement) addressing the factors described in the GL Supplement. The assessment confirms the applicability of the generic assessments to PBAPS, Units 2 and 3 with supplementary monitoring activities implemented, (compensating for differences between the PBAPS steam leak detection design and the associated assumptions in the generic assessments) and provides a comprehensive technical discussion of how we made the applicability determination. The supplementary monitoring activities will be fully implemented within 30 days, and remain in effect, when required, until potential MOV deficiencies are resolved. Interim compensatory measures are now being implemented. The assessment is available on-site for review.

At LGS, Units 1 and 2 the HPCI, RCIC and RWCU supply line containment isolation valves are globe valves and there is no isolation condenser. The NRC test data, however, resulted from tests of flexible wedge gate valves. We have concluded that this test data is not applicable to the HPCI, RCIC and RWCU System supply line containment isolation valves installed at LGS, Units 1 and 2. Furthermore, we have not identified any valves at LGS, Units 1 and 2 with deficiencies of greater safety significance. Therefore, we consider a plant-specific safety assessment to be unnecessary for LGS, Units 1 and 2. A report reflecting this position is available on-site for review. Our conclusion that a plant-specific safety assessment is unnecessary for LGS, Units 1 and 2 was discussed with and agreed upon by the NRC Technical Contact for GL 89-10 Supplement 3 on November 28, 1990.

If you have any questions or require additional information, please contact us.

Very truly yours,

G. J. Beck, Manager
Licensing Section
Nuclear Engineering and Services

Enclosure: Affidavit

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PB
T. J. Kenny, USNRC Senior Resident Inspector, LGS

COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF CHESTER :

D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; that he has read the 30-day response to Generic Letter 89-10, Supplement 3, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

D R Helwig

Vice President

Subscribed and sworn to
before me this 14th day
of December 1990.

Judith Y Franklin

Notary Public

NOTARIAL SEAL
JUDITH Y. FRANKLIN, Notary Public
City of Philadelphia, Phila. County
My Commission Expires July 28, 1991