



January 16, 1991

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

Subject: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Follow-up Letter to Generic Letter 89-10 "Safety-
Related Motor-Operated Valve Testing and
Surveillance"

Gentlemen:

Generic Letter 89-10, NRC letter dated June 28, 1989 (ØCNAØ68926), requires a long term program for ensuring operability of safety-related motor-operated valves (MOVs). The Entergy Operations response to the generic letter for Arkansas Nuclear One (ANO) dated December 28, 1989 (ØCAN128913), discussed our approach to meeting the recommended actions except for specifics on conducting MOV differential pressure testing and completion schedule. This follow-up response, requested by your letter dated May 30, 1990 (ØCNAØ59Ø29), restates our commitment to have an effective MOV program and clarifies exceptions to the recommended actions.

The ANO MOV program is embodied in ANO Procedure 1025.011, "Motor Operated Valve (MOV) Maintenance Program" and is available for review. An additional document, ANO MOV Program Overview, has been developed to describe ANO's testing approach and support of industry initiatives. Procedure 1025.011 contains a listing of valves including those determined necessary for Generic Letter 89-10 and a preliminary schedule for testing. Revision 1 to the procedure will remove this valve list and include it as an attachment to the ANO MOV Program Overview so it can be maintained current and reflect industry activities. The current valve scope for Generic Letter 89-10 includes 119 valves for Unit 1 and 161 valves for Unit 2.

The MOV program at ANO has been evolving along with industry developments and as improvements are deemed applicable, they are factored into our program. Improvements in diagnostic testing equipment and procedures have been added through introduction of the VOTES testing system to augment the existing Henze-Movats test equipment. The detailed design basis review has been modified to include various enhancements for predicting valve response and loadings. This review is on schedule for supporting valve setup and testing.

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The ANO MOV commitments contained in our letter of December 28, 1989, are unchanged except for the approach being taken for differential pressure testing. Specific compliance with the generic letter approach for valve operability verification by full flow/pressure testing within the recommended schedule is still a concern as previously discussed in our response. Entergy Operations believes that a program which utilizes a combined approach of limited full flow/pressure testing, testing under less than design conditions using extrapolated results and similarity application of industry test data can effectively verify valve operability. The approach being taken by Entergy Operations at ANO is expected to verify valve operability within the three (3) refueling outage, five (5) year time frame requested by the generic letter.

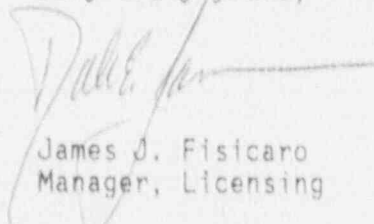
Entergy Operations at ANO has generated an initial list of those valves in the ANO MOV program which we believe can be tested at full flow/pressure conditions, partial flow/pressure conditions and those valves which we believe cannot be readily tested in situ. The ANO approach will use a combination of in-plant testing, conservative static testing, and similarity from ANO in-plant testing and industry test data to verify MOV operability. Ongoing industry activities, such as being conducted by EPRI, will help establish better valve testing programs and data bases which can be used to limit extensive full flow in-plant testing. It is Entergy Operations goal to ensure that the ANO MOV Program valve population will be verified operable through testing or justified using valve similarity and test data at reduced pressures within the recommended time frame.

To accomplish this goal, Entergy Operations will remain actively involved in industry and system-wide programs for improved program development and data sharing. Entergy Operation's is in participation with the EPRI Performance Prediction Program and the Motor Operated Valve Users Group (MUG). ANO currently chairs the BWOV Valve Working Group and supports other involved groups such as NUMARC and the EPRI Valve Symposium.

As required by Generic Letter 89-10, Entergy Operations will notify the NRC of any change in our commitments or schedule compliance with the generic letter. This information is provided under oath in accordance with 10 CFR 50.54 (f).

Should you have any questions regarding this issue, please contact me.

Very truly yours,


for James J. Fisicaro
Manager, Licensing

JJF/JRH/sgw

cc: Mr. Robert Martin
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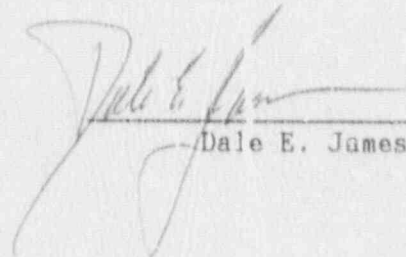
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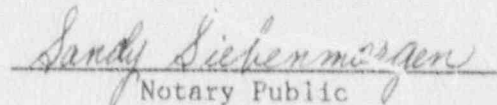
STATE OF ARKANSAS)
) SS
COUNTY OF LOGAN)

I, Dale E. James, being duly sworn, subscribe to and say that I am Supervisor, Licensing, within Entergy Operations, Inc. at ANO; that I have full authority to execute this oath; that I have read the document numbered 0CAN019105 and know the contents thereof; and that to the best of my knowledge, information and belief, the statements in it are true.



Dale E. James

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 17th day of January, 1991.



Notary Public

My Commission Expires:

May 11, 2000