

February 28, 1994

Docket No. 50-461

Clinton Power Station
ATTN: Mr. Richard F. Phares
Director - Licensing
Post Office Box 678
Mail Code V920
Clinton, Illinois 61727

Dear Mr. Phares:

SUBJECT: EXTENSION OF GENERIC LETTER 89-10 PROGRAM SCHEDULE - CLINTON POWER STATION, UNIT NO. 1 (TAC NO. M88562)

Your letter of January 13, 1994 (02225), requested a schedule extension to complete Generic Letter (GL) 89-10 activities for 70 motor operated valves in Illinois Power's GL 89-10 program. The proposed schedule would extend the original completion date of June 28, 1994, to the end of the sixth refueling outage scheduled to begin during October of 1996.

Based on the staff's review, we do not consider your submittal to be sufficient to justify an extension of your GL 89-10 program to late 1996. Enclosed is a request for additional information necessary to complete our review. You are requested to respond within 60 days of receipt of this letter. If you have any questions, please feel free to contact me on 301-504-1324.

Sincerely,

ORIGINAL SIGNED BY

Douglas V. Pickett, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
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Mr. Richard F. Phares
Illinois Power Company

Clinton Power Station
Unit No. 1

cc:

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REQUEST FOR ADDITIONAL INFORMATION
SCHEDULE EXTENSION FOR GENERIC LETTER 89-10
CLINTON POWER STATION
DOCKET NO. 50-461

1. The licensee's submittal of January 13, 1994, does not indicate which motor-operated valves (MOV) will have their Generic Letter (GL) 89-10 schedule extended to Refueling Outage 5 (March 1995) and which MOVs will have their schedules extended to Refueling Outage 6 (October 1996).
2. The licensee's submittal needs to compare thrust requirements for the MOVs with an extended GL 89-10 schedule more directly to MOV dynamic test data at Clinton. In particular, the licensee should provide information justifying that the valve factor (indicating whether orifice or mean seat is used), dynamic stem friction coefficient, and packing load assumed for particular extended-schedule MOVs are appropriate based on test data from other specific MOVs at Clinton or other sources. For example, an assumption of a 0.45 valve factor might not be appropriate for all Anchor-Darling gate valves at Clinton. Also, the licensee's submittal does not indicate which six butterfly valves were tested and the applicability of those tests to specific butterfly valves with an extended GL 89-10 schedule at Clinton. Further, the licensee should discuss the applicability of the EPRI test data on globe valves to its valve factor assumptions.
3. The licensee should discuss more specifically its assumptions in determining degraded voltage capability of the extended-schedule MOVs. For example, the licensee states that a 1.0 application factor is used in motor sizing calculations. The licensee did not state whether the 1.0 application factor is used when degraded voltage is above 90 percent where Limitorque does not require a calculational penalty for degraded voltage and does not endorse use of the 1.0 application factor. Also, the licensee should discuss (1) whether rated motor start torque is assumed, (2) whether run or pullout efficiency is assumed, and (3) the method for calculating the degraded voltage factor.
4. The licensee states that "low-safety-significant" MOVs will be maintained at a conservative, but appropriate, design margin corresponding to their low safety significance. However, the licensee states that this margin does not include an allowance for diagnostic system inaccuracy or torque switch repeatability. Also, it is not apparent that the licensee addressed valve-specific load sensitive behavior. The absence of consideration of these uncertainties in justifying the extended schedules for the 70 MOVs in Appendix B to Attachment 3 is not justified. A review of the information in Appendix B indicates that several MOVs would not meet the licensee's acceptance criteria if those uncertainties are included.

5. The licensee's submittal does not justify that its planned method for periodic verification will ensure that safety-related MOVs continue to be capable of performing their design-basis safety function. The licensee will be expected to justify an acceptable method as part of its response to GL 89-10.