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

January 11, 1991

Docket Nos. 50-266
and 50-301

Mr. C. W. Fay, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 W. Michigan Street, Room 308
Milwaukee, Wisconsin 53201

Dear Mr. Fay:

SUBJECT: RESPONSE TO GENERIC LETTER 89-10, "SAFETY-RELATED MOTOR-OPERATED VALVE (MOV) TESTING AND SURVEILLANCE" (TAC NOS. 75702 AND 75703)

On June 28, 1989, the NRC issued Generic Letter (GL) 89-10 requesting licensees to establish a program to ensure the operability of all safety-related MOVs under design basis conditions. The program in GL 89-10 significantly expands the scope of the program outlined in NRC Bulletin 85-03 and its supplement.

The schedule provided in the generic letter requested that a description of your MOV program be available for review by June 28, 1990, or the first refueling outage after December 28, 1989, whichever was later. Due to delays in issuing Supplement 1 of the generic letter, the staff decided to delay inspections until at least January 1, 1991. Information that should be contained in your program description was discussed during the workshops held in September 1989. Staff positions on questions presented during the workshops are currently available in Supplement 1 to the generic letter. As your MOV program is developed, justification for any differences between your program and the GL as clarified by Supplement 1 should be incorporated into your program description.

On December 15, 1989, you submitted a letter in response to GL 89-10, regarding the Point Beach Nuclear Plant stating that you intend to meet the schedule and recommendations of the generic letter, with one exception. Staff comments on that exception are provided below.

Item c of Generic Letter 89-10 requests that licensees perform tests of MOVs in situ under design-basis conditions where practicable. In cases where such testing is not practicable, the GL indicates that licensees should develop alternatives to demonstrate that the MOV will operate under design-basis conditions. In your December 15 submittal, you propose the categorization of MOVs into families based on type, size and manufacturer. One MOV from each family would be tested under design-basis conditions with the test results applied to other MOVs in that family. The staff has concerns regarding your proposal. One reason for the staff's recommendation that MOVs be tested in situ under design-basis conditions, where practicable,

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was the difficulty in justifying the applicability of test data from one MOV to another. Operating experience and research results have revealed that MOVs appearing identical and operating similarly at static conditions may have significantly different operating characteristics during higher differential pressure or flow. You will need to justify the applicability of test data from one MOV to another.

Additionally, you indicated that the methods used to implement Bulletin 85-03 had been found acceptable by the NRC staff. As discussed at the public workshops held in September 1989 on the GL, the methods of applying test data from one MOV to another that were considered acceptable for the implementation of Bulletin 85-03 will not be acceptable to the staff for the implementation of Generic Letter 89-10 without further justification. Rather than using methods of data transfer that are suspect, the staff would prefer that you follow an alternative approach such as the "two-stage" approach as outlined in the GL and discussed at the workshops when design-basis in situ testing is not practicable.

Your program description should be retained on-site for NRC staff review.

Sincerely,

original signed by

Robert B. Samworth, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

DOCUMENT NAME: GL 89-10 RESPONSE MOV

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