



Carolina Power & Light Company  
PO Box 10429  
Southport NC 28461-0429

William R. Campbell  
Vice President  
Brunswick Nuclear Plant

SERIAL: BSEP 95-0537

OCT 16 1995

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62  
RESPONSE TO THE NRC STAFF REQUEST FOR INFORMATION REGARDING NRC  
GENERIC LETTER 95-07, "PRESSURE LOCKING AND THERMAL BINDING OF SAFETY-  
RELATED POWER-OPERATED GATE VALVES"

Gentlemen:

On August 17, 1995, the NRC issued Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves." The NRC requested that within 60 days from the date of the generic letter, each licensee should provide a written response indicating whether or not the licensee intends to implement the requested action(s) and provide a schedule for completing implementation.

Enclosure 1, provides Carolina Power & Light Company's (CP&L) response to the requested 60 day response to Generic Letter 95-07.

Please refer any questions regarding this letter to Mr. George Honma at (910) 457-2741.

Sincerely,

William R. Campbell

GMT/gmt

Enclosure:

1. Response
2. List of Regulatory Commitments

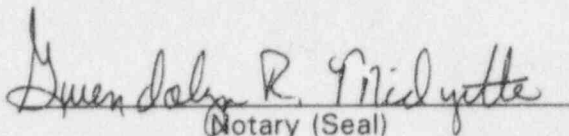
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Tel 910 457-2496 Fax 910 457-2803

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William R. Campbell, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, and agents of Carolina Power & Light Company.

  
Notary (Seal)

My commission expires: August 12, 1996

- cc: Mr. S. D. Ebnetter, NRC Regional Administrator, Region II  
Mr. C. A. Patterson, NRC Senior Resident Inspector - Brunswick Plant  
Mr. D. C. Trimble, Jr., NRR Project Manager - Brunswick Plant  
The Honorable H. Wells, Chairman - North Carolina Utilities Commission

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKET NOS. 50-325 & 50-324  
OPERATING LICENSE NOS. DPR-71 & DPR-62

RESPONSE TO THE NRC STAFF REQUEST FOR INFORMATION REGARDING NRC  
GENERIC LETTER 95-07, "PRESSURE LOCKING AND THERMAL BINDING OF SAFETY-  
RELATED POWER-OPERATED GATE VALVES "

Requested Actions

CP&L's Brunswick Steam Electric Plant, Unit Nos. 1 and 2 plan to implement the requested actions of Generic Letter 95-07 as described in the following:

A. 90-Day Requested Actions

NRC Request

*Within 90 days of the date of this generic letter, each addressee of this generic letter is requested to perform and complete the following actions:*

- 1. Perform a screening evaluation of the operational configurations of all safety-related power-operated (i.e., motor operated, air operated, and hydraulically operated) gate valves to identify those valves that are potentially susceptible to pressure locking or thermal binding; and*
- 2. Document a basis for the operability of the potentially susceptible valves or, where operability cannot be supported, take action in accordance with individual plant Technical Specifications.*

CP&L Response

1. Safety-related power-operated gate valves will be reviewed for applicability of Generic Letter 95-07. The generic letter will be considered applicable to those power-operated (motor, air, and hydraulic) gate valves having a design basis safety function to open. These valves will then be screened for potential susceptibility to PL/TB.
2. Within the 90-day review period, a basis for operability will be documented for valves identified to be potentially susceptible to PL/TB. This basis will document the acceptability of existing configurations while more detailed reviews are performed. Appropriate actions, including operability determinations, will be taken if at any point in the screening process a valve is determined to be incapable of performing its safety function.

The above 90 day Requested Actions 1 and 2 will be completed by November 15, 1995.

B. 180-Day Requested Actions

NRC Request

*Within 180 days of the date of this generic letter, each addressee of this generic letter is requested to implement and complete the guidance provided in Attachment 1 [to the Generic Letter] to perform the following actions:*

1. *Evaluate the operational configurations of safety-related power-operated (i.e., motor-operated, air-operated, and hydraulically operated) gate valves in its plant to identify valves that are susceptible to pressure locking or thermal binding;*
  
2. *Perform further analyses as appropriate, and take needed corrective actions (or justify longer schedules), to ensure that the susceptible valves identified in 1 are capable of performing their intended safety function(s) under all modes of plant operation, including test configuration.*

CP&L Response

1. Valves identified as potentially susceptible will be further evaluated to determine what effects, if any, PL/TB conditions may have on the capability of the valve to perform its safety function. Analytical techniques and/or testing may be employed where appropriate. Operability determinations will be performed as noted above in cases where the valve is determined to actually be susceptible to pressure locking or thermal binding.
  
2. Appropriate corrective actions (equipment and/or procedure) to mitigate PL/TB will be identified for valves where safety function capability is not demonstrated. A schedule for implementing corrective actions will be developed based on valve risk significance, refueling outage schedules, and other pertinent factors. Corrective actions to mitigate PL/TB will be implemented as scheduled.

The above 180 day Requested Actions 1 and 2 will be completed by February 13, 1996. The schedule and justification for remaining corrective actions will be provided as part of Actions C.2 and 3.

C. 180-Day Requested Information

NRC Request

Generic Letter 95-07 also requested that a summary description the following information be submitted within 180 days of the date of the Generic Letter:

1. *The susceptibility evaluation of operational configurations performed in response to (or consistent with) 180-day Requested Action 1, and the further analysis performed in response to (or consistent with) 180-day Requested Action 2, including the bases or criteria for determining that valves are or are not susceptible to pressure locking or thermal binding;*
2. *The results of the susceptibility evaluation and the further analyses referred to in 1 above, including a listing of the susceptible valves identified;*
3. *The corrective actions, or other dispositioning, for the valves identified as susceptible to pressure locking or thermal binding, including: (a) equipment or procedural modifications completed and planned (including the completion schedule for such actions); and (b) justification for any determination that particular safety-related power-operated gate valves susceptible to pressure locking or thermal binding are acceptable as is.*

#### CP&L Response

CP&L plans to provide the requested information, in summary form, by April 26, 1996, rather than within 180 days. Currently Brunswick Unit 2 is scheduled for a refueling outage (B212R1), which is scheduled to commence on February 2, 1996, and end on March 28, 1996. Therefore, CP&L will provide the following requested information by April 26, 1996, which is approximately 30 days after completion of the scheduled Unit 2 refueling outage:

1. Susceptibility evaluations of operational configurations performed in response to 180-day CP&L response Action 1, and the further analysis performed in response to 180-day CP&L response Action 2, including the bases or criteria for determining that valves are or are not susceptible to pressure locking or thermal binding;
2. The results of the susceptibility evaluation and the further analyses referred to in 1 above, including a listing of the susceptible valves identified;
3. Corrective actions (equipment and procedure) that have been completed or are planned to mitigate the effects of PL/TB in susceptible valves, and the accompanying corrective action schedule. Also, further evaluations and /or analyses performed to demonstrate that potentially susceptible valves are capable of performing their safety function "as-is" will be provided.

ENCLOSURE 2  
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2  
NRC DOCKET NOS. 50-325 & 50-324  
OPERATING LICENSE NOS. DPR-71 & DPR-62

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LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Carolina Power & Light Company in this document. Any other actions discussed in the submittal represent intended or planned actions by Carolina Power & Light Company. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager-Regulatory Affairs at the Brunswick Nuclear Plant of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed date or outage
1. 90-day CP&L Response Actions 1 and 2 above (see enclosure 1) will be completed by November 15, 1995.	11/15/95
2. 180-day CP&L Response Actions 1 and 2 above (see enclosure 1) will be completed by February 13, 1996.	2/13/96
3. Corrective actions will be implemented per the schedule developed under 180-day CP&L Response Action 2 (see enclosure 1).	N/A
4. 180-day requested information will be provided as indicated in the CP&L Response portion of section C of enclosure 1.	4/26/96