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VPNPD 95-079

October 9, 1995

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U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555-0001

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO GENERIC LETTER 95-07
PRESSURE LOCKING AND THERMAL BINDING OF SAFETY-RELATED POWER
OPERATED GATE VALVES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On August 17, 1995, the Nuclear Regulatory Commission issued Generic Letter (GL) 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves." GL 95-07 confirms the NRC staff position on this issue as presented in NRC Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," Supplement 6. The position is that licensees are expected, under existing regulations, to take actions as necessary to ensure that safety-related, power-operated gate valves susceptible to pressure locking or thermal binding are capable of performing their required safety functions.

As a result, the staff has requested that addressees perform, or confirm previous performance, of:

Within 90 days:

1. Perform a screening evaluation to identify valves which are potentially susceptible to pressure locking and/or thermal binding.
2. Document a basis for operability of potentially susceptible valves, or take actions in accordance with Technical Specifications.

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Within 180 days:

1. Evaluations of operational configurations of safety-related, power-operated (including motor, air, and hydraulically operated) gate valves for susceptibility to pressure locking and thermal binding.
2. Further analyses, and any needed corrective actions, to ensure that identified potentially susceptible valves are capable of performing their current licensing basis safety functions.

Wisconsin Electric Power Company intends to perform all of the requested actions discussed within the Generic Letter. However, we propose an exception to the 90-day time period for basis documentation of identified potentially susceptible valves.

We propose to meet an alternative schedule for the operability basis documentation. Wisconsin Electric has joined a Westinghouse Owners Group (WOG) project designed to address the requirements of the Generic Letter. In part, this project will establish a common set of criteria which can be applied in the screening and evaluation of the pressure locking and thermal binding phenomena. Most of the NSSS systems, as well as many of the valves in those systems, are common among the various Westinghouse plants. Thus, it is beneficial and cost effective, to both WOG members and the NRC, to utilize the expertise of the member utilities and Westinghouse to develop a consistent, effective, and comprehensive set of screening and evaluation criteria that can be used by all WOG plants.

Criteria and methodology will also be developed for use in the evaluations of those valves determined to be susceptible to pressure locking and/or thermal binding. These evaluations will determine the need for additional analysis and/or valve modifications. In addition, an end product of the project is the development of operability justifications for those valves identified as potentially susceptible. If operability justifications cannot be demonstrated, the applicable technical specification actions will be followed.

We have previously performed several of the screenings of our safety-related, power-operated gate valves as part of our efforts from Generic Letter 89-10. We are currently evaluating several valves for potential susceptibility to pressure locking and/or thermal binding as a result of these screenings. However, we believe that the detailed evaluations to be performed as part of the WOG effort are the key factors in resolving the concerns