Log # TXX-95263
File # 10035
Ref. # 10CFR50.54(f)
GL 95-07

October 16, 1995

C. Lance Terry
Group Vice President

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555-0001

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446 UNITS 1 AND 2
RESPONSE TO GENERIC LETTER 95-07, "PRESSURE LOCKING AND THERMAL BINDING OF SAFETY RELATED POWER OPERATED GATE VALVES"

REF: 1) Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety Related Power Operated Gate Valves," dated August 17, 1995

Gentlemen:

On August 17, 1995, the NRC issued Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety Related Power Operated Gate Valves" (Reference 1).

Pursuant to Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f), TU Electric is submitting a response under affirmation (Attachment 1) to the requested information and requested actions as stated in Reference 1.

NRC GL-95-07 Requested Actions:

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.

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 perform the following actions:

1. Evaluate the operational configurations of safety-related power-operated (i.e., motor-operated, air-operated, and hydraulically

A056

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.

NRC GL-95-07 Requested Information:

All addressees, including those who have already satisfactorily addressed pressure locking and thermal binding for MOVs by implementing the guidance in Supplement 6 to GL 89-10 (or equivalent industry methods), are requested to provide a summary description of the following:

1. The susceptibility evaluation of operational configurations performed in response to (or consistent with) 180-day Requested Action 1, and the further analyses 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.

NRC GL-95-07 Required Response:

All addressees are required to submit the following written response to this generic letter:

1. Within 60 days from the date of this generic letter, a written response indicating whether or not the addressee will implement the action(s) requested above. If the addressee intends to implement the requested action(s), provide a schedule for completing implementation. If an addressee chooses not to take the requested action(s), provide a description of any proposed alternative course of action, the schedule for completing the alternative course of action (if applicable), and the safety basis for determining the acceptability of the planned alternative course of action;

2. Within 180 days from the date of this generic letter, a written response to the information request specified above.

TU Electric response:

1) The Westinghouse Owners Group (WOG) has developed a program to assist in addressing the requirements of GL 95-07. The aforementioned program is establishing a set of criteria, which can be applied in the screening and evaluation of gate valves for the pressure locking and thermal binding phenomena. This set of screening criteria is being defined to identify valves potentially susceptible to pressure locking and thermal binding, taking into account both component and system considerations. Criteria and methodology are also being developed to assist in the evaluation of susceptibility of each valve determined to be potentially susceptible to pressure locking and thermal binding. Once the criteria have been established, TU Electric will apply the criteria to Comanche Peak Steam Electric Station's (Units 1 and 2) population of safety-related, power-operated gate valves. As susceptible valves are identified, the evaluation criteria and methodology will be used to determine the need for additional analysis and/or valve modifications.

   TU Electric intends to implement the actions requested in GL 95-07, and has commenced the initial screening evaluations. The WOG Task Team has established an aggressive schedule for the criteria development for valves susceptible to pressure locking and thermal binding, and this criteria will be reviewed and utilized as it becomes available. If at any time the susceptibility evaluation identifies a valve as being susceptible to either pressure locking or thermal binding, and corrective actions have not been taken, an operability assessment will be performed and a justification for continued operations developed. If operability cannot be demonstrated, the applicable Technical Specifications actions will be followed.

2) TU Electric will comply with all actions and responses specified in the 180-day required response. These include completion and documentation of the following:

   - Screening criteria.
   - List of susceptible valves.
   - Description of evaluations.
   - Susceptibility evaluation results.
   - Corrective actions taken or scheduled.
   - Justifications for continued operations, as needed.

These actions will be completed and the responses provided to the NRC within 180 days of the date of Generic Letter 95-07.

If you have any questions, please contact Obaid Bhatty at (817) 897-5839.

Sincerely,

C. L. Terry

OB/ob
Attachment

c - Mr. L. J. Callan, Region IV
Resident Inspectors, CPSES
Mr. T. J. Polich, NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Texas Utilities Electric Company	)	Docket Nos. 50-445
	)	and 50-446
(Comanche Peak Steam Electric Station, Units 1 & 2)	)	

AFFIDAVIT

Charles L. Terry being duly sworn, hereby deposes and says that he is the Group Vice President, Nuclear Production of TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this Response to Generic Letter 95-07, Pressure Locking and Thermal Binding of Safety Related Power Operated Gate Valves"; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

Charles L. Terry
Group Vice President,
Nuclear Production

STATE OF TEXAS)
)
COUNTY OF Somervell)

Subscribed and sworn to before me, on this 16th day of October, 1995.

SUSAN C. GRAVATT
NOTARY PUBLIC
STATE OF TEXAS
Commission Expires 3-24-97

Susan C. Gravatt
Notary Public