



NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20545-0001

November 3, 1995

Mr. J. F. Cross
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division
Duquesne Light Company
Post Office Box 4
Shippingport, PA 15077

SUBJECT: COMMENTS REGARDING DUQUESNE LIGHT COMPANY'S 60-DAY RESPONSE TO
GENERIC LETTER (GL) 95-07, "PRESSURE LOCKING AND THERMAL BINDING OF
SAFETY-RELATED POWER-OPERATED GATE VALVES," BEAVER VALLEY POWER
STATION, UNITS 1 AND 2 (TAC NOS. M93429 AND M93430)

Dear Mr. Cross:

On August 17, 1995, the NRC issued GL 95-07. This GL requested certain actions on a 90-day and 180-day schedule and a response within 60 days indicating the licensee's intended actions regarding the requested actions. By letter dated October 16, 1995, Duquesne Light Company (DLC) submitted its 60-day response to GL 95-07 for Beaver Valley Power Station, Units 1 and 2. In its response, DLC stated that, based on evaluations previously performed and the industry effort in developing screening criteria, it plans to waive the 90-day requested actions of GL 95-07 and that the actions and responses specified in the 180-day required response will be complied with.

In its 60-day response to GL 95-07, DLC proposed an alternative course of action. However, DLC has not provided an adequate safety basis for determining the acceptability of this planned alternative course of action, as requested by the GL. The NRC staff established the recommended actions for the 90-day screening evaluation in GL 95-07 to provide confidence that no short-term safety concerns exist regarding particular valves as a result of pressure locking and thermal binding. The purpose of this action is for licensees to ensure that no critical deficiencies exist in past evaluations, and take action if appropriate. The essence of the 90-day screening evaluation is to conduct an initial assessment, using current knowledge, of all safety-related power-operated gate valves to assure they are operable should they be potentially susceptible to pressure locking or thermal binding.

The NRC staff considers a prompt screening evaluation to be reasonable considering the length of time the industry has been aware of and had opportunity to take action for situations involving pressure locking and thermal binding. As described in GL 95-07, the NRC staff has provided several notifications of this issue in the past 2 years. Additionally, notifications from the Institute for Nuclear Power Operations (INPO) include Significant Operating Experience Report 84-7, "Pressure Locking and Thermal Binding of Gate Valves," dated December 14, 1984, and INPO Significant Event Report 8-88, "Pressure Locking of Residual Heat Removal Gate Valves," dated March 25, 1988.

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Based on our review, we do not find DLC's submittal to be fully responsive in that your reliance on previous evaluations, which may not have considered recent information, is contrary to the above stated purpose of the 90-day requested actions. In light of recent industry events involving pressure locking and thermal binding of safety-related power-operated gate valves, we conclude that the intention to waive the 90-day requested actions of GL 95-07 does not allow DLC to assure itself of the current operability of these valves. Therefore, DLC is requested to commit to the 90-day requested actions of GL 95-07 or provide the safety basis for determining the acceptability of the planned alternative course of action by November 15, 1995.

The information requested by this letter is within the scope of the overall burden estimated in GL 95-07, which was a maximum of 75 hours per response. This request is covered by the Office of Management and Budget Clearance Number 3150-0011, which expires July 31, 1997.

Should you have any questions on this matter, please contact me at (301) 415-1409.

Sincerely,

/s/

Donald S. Brinkman, Sr. Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Donald S. Brinkman, Sr. Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

J. E. Cross
Duquesne Light Company

Beaver Valley Power Station
Units 1 & 2

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