



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 8, 1995

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, Michigan 48166

SUBJECT: 60-DAY RESPONSE TO GENERIC LETTER 95-07 (TAC NO. M93463)

Dear Mr. Gipson:

On August 17, 1995, the NRC issued Generic Letter (GL) 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves." 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 13, 1995, Detroit Edison Company submitted its 60-day response to GL 95-07 for Fermi 2. In its response, Detroit Edison Company stated that, based on evaluations previously completed, it intends to perform the 90-day requested actions of GL 95-07 within 180 days, and the 180-day requested actions within one year.

In its 60-day response to GL 95-07, Detroit Edison Company proposed an alternative course of action. However, Detroit Edison Company has not provided an adequate safety basis for determining the acceptability of this planned alternative course of action, as requested by the GL. The 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 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 staff has provided several notifications of this issue in the past two 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.

The purpose of the 180-day requested actions is for licensees to further analyze or identify, schedule, and take corrective action for those susceptible valves, in a timely manner, to assure that they are capable of performing their intended safety functions under all modes of plant operation.

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Based on our review, we do not find Detroit Edison Company's submittal to be fully responsive in that reliance on previous evaluations performed as well as later evaluations that may not have considered recent information, is contrary to the above stated purpose of the 90-day and 180-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 decision to complete the 90-day requested actions of GL 95-07 within 180 days does not allow Detroit Edison Company to assure itself of the current operability of these valves. We further conclude that the decision to complete the 180-day requested actions within one year does not allow for timely further analysis or the identification, scheduling and implementation of necessary corrective actions. Therefore, Detroit Edison Company is requested to commit to complete the 90-day and 180-day requested actions of GL 95-07 within the time specified by the GL or provide a more detailed safety basis for determining the acceptability of the planned alternative course of action by November 15, 1995. Should you have any questions on this matter, please contact me at (301) 415-1341.

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.

Sincerely,

Original signed by
Lihn Tran for

Timothy Colburn, Sr. Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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cc: See next page

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