



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 27, 1995

Mr. Guy R. Horn
Vice President - Nuclear
Nebraska Public Power District
P. O. Box 499
Columbus, NE 68602-0499

SUBJECT: CHANGES TO GENERIC LETTER 89-10 COMMITMENTS - COOPER NUCLEAR STATION
(TAC NO. M93414)

Dear Mr. Horn:

We have reviewed the letter dated September 6, 1995, from John H. Mueller, in which the Nebraska Public Power District (NPPD) informed the NRC of changes to commitments in the motor-operated valve program at the Cooper Nuclear Station (CNS). The letter stated that NPPD is revising commitments made in response to NRC Generic Letter 89-10 (GL 89-10), "Safety-Related Motor-Operated Valve Testing and Surveillance," based on a review of current industry practices.

Your September 6, 1995, letter stated that NPPD has completed all planned static testing, and has also completed the dynamic testing of 35 valves out of a total of 52 for which dynamic testing was planned. In that letter, you proposed the following changes to your GL 89-10 program: (1) the dynamic testing of 12 of the remaining 17 motor-operated valves (MOVs) for which dynamic testing was planned will not be performed; and (2) the dynamic retesting of HPCI-MOV-M058 will not be performed.

NPPD initially committed to dynamically test RCIC-MOV-M0131 and RCIC-MOV-M0132 due to the high probabilistic safety assessment ranking for these valves. These two globe valves have a safety function to open only and are flow assisted in the open direction. Your staff does not believe that dynamic data for these valves would be reliable in calculating valve factor or capability. The basis for this position is that, if the packing friction load is overcome by the stem rejection force, the data becomes unquantifiable. Therefore, although static diagnostic testing has been performed, your staff concluded that dynamic testing of these two valves would not provide any new and credible information. The NRC staff does not object to your position on this issue; however, your GL 89-10 program should ensure that adequate torque capability is available for actuator torque requirements for the safety function.

The following 10 MOVs; REC-MOV-700MV, REC-MOV-711MV, REC-MOV-714MV, REC-MOV-1329MV, RHR-MOV-M027B, RHR-MOV-M066B, SW-MOV-886MV, SW-MOV-887MV, SW-MOV-888MV, and SW-MOV-889MV, were originally planned to be dynamic tested, if practicable, after static testing to validate calculation results that indicate the valve in question is capable of performing its design basis function. NPPD is proposing to use a high margin approach to eliminate the necessity for dynamically testing these valves. In Attachment II of the September 5, 1995, letter, NPPD provided a detailed explanation of the approach. When using this approach, it is important to ensure that these

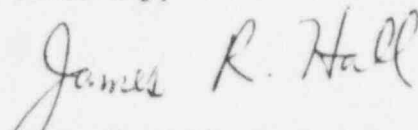
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valves are appropriately grouped with other MOVs that have known valve factors in order to establish margin above the design-basis valve factor. Contrary to your note in Attachment II to your letter that the staff has accepted specific generic valve factors, the staff believes that valve factors should be justified for each valve based on applicable data. Nevertheless, the staff agrees that the conservatism built into your "high margin" approach in this case eliminates the necessity to dynamically test these valves.

Because high unseating torque was noted after performing a hydrostatic test on HPCI-MOV-M058, NPPD had originally committed to dynamically test this valve. However, since that test, the valve has been reworked (lapped-seat) and the actuator refurbished. Following the rework, NPPD has successfully performed three static diagnostic tests which demonstrated a significant reduction in the unseating torque (approximately 80 ft-lbs). The staff agrees that a second hydrostatic test is not required for HPCI-MOV-M058, because the unseating problem appears to have been resolved by the rework, and you indicated that data from the original hydrostatic test produced conservative results with regard to the stem friction coefficient and valve factor.

Based on our review of your letter, we conclude that you have provided adequate justification for the proposed commitment changes. With respect to valves RR-MOV-M053A and RR-MOV-M053B, you indicated that an evaluation is being conducted that will modify the design-basis stroke time and reduce the valves' maximum expected differential pressures. The staff considers the design change and plans for RR-MOV-M053A and RR-MOV-M053B to be acceptable; however, we request that you inform the staff of the results of this evaluation and of any further modifications to the valves arising from the evaluation findings. Please call me at (301) 415-1336, if you have any questions.

Sincerely,



James R. Hall, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-298

cc: See next page

Mr. Guy R. Horn
Nebraska Public Power Company

Cooper Nuclear Station

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Original Signed By:
James R. Hall, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
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