



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

July 30, 1992

Docket No. 50-482

Mr. Bart D. Withers
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

Dear Mr. Withers:

SUBJECT: WOLF CREEK GENERATING STATION - STAFF REVIEW OF GENERIC LETTER 90-06, "RESOLUTION OF GENERIC ISSUE 70, 'POWER-OPERATED RELIEF VALVE AND BLOCK VALVE RELIABILITY,' AND GENERIC ISSUE 94, 'ADDITIONAL LOW-TEMPERATURE OVERPRESSURE PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)" (TAC NOS. M77395 AND M77471)

By letters dated December 21, 1990 and May 14, 1991, Wolf Creek Nuclear Operating Corporation, responded to Generic Letter 90-06. The generic letter represented the technical resolution of two generic issues and included plant backfits which were cost-justified safety enhancements. Generic Issue 70 included upgrades in quality requirements, inservice testing requirements, and modified technical specifications for all pressurized water reactor facilities that incorporate PORVs and block valves in their design. The intended purpose was to enhance the overall reliability of the PORVs and block valves so that they could better perform the safety functions identified in the generic letter. Generic Issue 94 included modified technical specifications for all Westinghouse and Combustion Engineering facilities to reduce the allowed outage time for an inoperable LTOP channel and thus reduce the probability of overpressurization events during shutdown conditions.

The staff has reviewed your submittals and finds that you have modified selected portions of the generic letter. It is the staff's position that a regulatory analysis has been performed in accordance with 10 CFR 50.109(a)(3) and 50.109(c) which justifies the backfit. Therefore, absent any information that demonstrates that your facility is not bounded by the regulatory analysis that accompanied the generic letter, you are requested to resubmit a response that is in keeping with the intent of the generic letter. The specific area of concern is as follows.

The staff position requires the 18-month PORV stroke test to be performed during Mode 3 (HOT STANDBY) or Mode 4 (HOT SHUTDOWN) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. Your submittal did not adequately meet this staff position. The staff is not accepting Mode 5 (COLD SHUTDOWN) testing simply because it is allowable by the ASME Code or that the NRC approved IST program includes Mode 5 for this particular test.

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The requirement to perform stroke tests of the PORVs during Modes 3 or 4 is a new position for some licensees. The basis for this position lies in the uncertainty introduced by stroke testing the PORVs at lesser system temperature conditions and then expecting them to perform adequately at operating system conditions. If this recommendation is not adopted, a sound technical basis should be provided (e.g., that such testing cannot be performed without significant system modifications or that the intent of such testing is accomplished by some other means). We note that one licensee has proposed the option to bench test the PORVs. This would be acceptable, provided the tests are performed at conditions simulating Mode 3 or 4 conditions or greater and provided the proper reinstallation of the PORVs and controls is verified. In another case, the staff accepted an argument from a licensee that the physical distance between the PORV and the pressurizer maintained the same temperature at the PORV in Modes 3, 4, or 5 such that there is no difference from the valve's perspective of testing in different Modes. In this case the facility had an air-operated PORV and was able to perform the PORV stroke test with the block valve closed such that the PORV would be primarily influenced by the ambient room conditions.

Additionally, the GL required that PORVs be stroke tested in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. This could be interpreted to mean that PORVs should be stroke tested during every shutdown and again during every startup. However, the inclusion of the PORVs in the IST program requires the valves be tested no more frequently than every three months (unless valve maintenance is performed) to demonstrate operability.

In summary, the staff maintains its position that the PORVs should be stroke tested during Modes 3 or 4 in order to verify the capability to function in an environment more representative of operating conditions. In your revised response, discuss how PORV stroke testing provides assurance that the PORVs will perform all necessary safety functions adequately at the required system operating conditions.

You are requested to respond within 60 days following receipt of this letter. If you would like to further discuss this issue prior to your response, please feel free to contact me.

Mr. Bart D. Withers

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Mr. Bart D. Withers

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The information requested by this letter is within the scope of the overall burden estimated in Generic Letter 90-06 for the resolution of Generic Issue 70 and Generic Issue 94, which was a maximum of 320 person-hours per licensee response. This request is covered by Office of Management and Budget Clearance Number 3150-0011, which expires May 31, 1994.

Sincerely,

Original Signed By

William D. Reckley, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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