

MAY 04 1987

Mr. A. G. Charbonneau, President  
MOVATS Incorporated  
2995 Johnson Ferry Road  
Marietta, Georgia 30062

Dear Mr. Charbonneau:

My staff has recently completed its review of Union Electric Company's March 5, 1987, revised response to IE Bulletin 85-03, "Motor-Operated Valve Common Mode Failures During Plant Transients Due to Improper Switch Settings", for the Callaway Plant. As you know, this response contained your generic program for satisfying the requirements of the bulletin.

The review of this response indicates that there is still a need for additional information before the program to assure motor-operated valve operability can be approved. The specific comments have been forwarded to Union Electric Company via the appropriate NRC regional office. In addition, in the interest of expediting resubmittal of the plan, which has potentially generic implications to a number of other facilities, a copy of these comments is enclosed for your consideration in preparing your revised submittal via Union Electric Company.

Sincerely,

Original Signed by  
Charles E. Rossi

Charles E. Rossi, Director  
Division of Operational Events Assessment  
Office of Nuclear Reactor Regulation

Enclosure:  
Request for Additional Information  
for Callaway 1

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REQUEST FOR ADDITIONAL INFORMATION (RAI) RE:  
REVIEW OF RESPONSES TO ACTION ITEM E OF IE BULLETIN 85-03

Licensee:  
Union Electric Company  
1901 Gratiot Street  
St. Louis, Missouri

Unit: Callaway 1  
Date of Response: 03/05/87  
(Response  
to Initial  
RAI)

Respondent:  
Donald F. Schnell  
Vice President, Nuclear

The information provided in your responses to Action Item e of IE Bulletin 85-03 was found to be deficient in some areas. Please provide the additional information requested by the following comments and questions:

1. Referring to Enclosure 1 (Page 1) of the latest response of 03/05/87, note that the following statement appears in the second paragraph of the response to RAI Question 1:  

"Due to the results of this (MOVATS') research, we have revised our submittal to no longer require one time  $\Delta P$  testing in the open direction."

Referring to the response to RAI Question 6 on Page 5 of Enclosure 1, note that the MOVATS data base does not include globe valves with orifice sizes less than 1.75 or greater than 2.0 inches.

We note that four 4-inch motor-operated globe valves (HV-5, 7, 9 & 11) are located in discharge lines of the AFW motor-driven pumps, and that two 1-1/2-inch motor-operated globe valves (HV-8813 & HV-8814B) are located in miniflow lines leading from the HHSI pumps to the RWST.

Will representative samples of these globe valves be delta-P tested in the open direction?
2. Please refer to Enclosure 2 (Page 3) of the latest response. Completion of revision of procedures for Phase II is scheduled for July 1, 1987. This date does not agree with the date of March 15, 1987 scheduled for Phase II on Page 6 of Enclosure 2.
3. Please refer to Attachment A (Page 2) of the latest response. Justification 19 should replace Justification 1 for valves AL-HV-5, 7, 9, 11.
4. Please refer to Attachment B (Item II-B, pages 3 and 4) of the latest response. Where in the response are conditions and precautions addressed for intentionally backseating a valve electrically?

5. Several entries in Table 2 of Attachment B to the Union Electric submittal indicate that the actual closing force was greater than the calculated closing force (Log # 15, 91, 92, 105, 109, 110, 111). Each of these should be explained in detail since the figures indicate that the formula used to predict closing force may have been unconservative in these cases.
6. At a meeting between NRC and Union Electric Co. on February 19, 1987 the question of motor control center (MCC) testing of the motor-operated valves was discussed at some length. The question of MCC testing after "adjustment" of valve stem packing was discussed and several alternatives were mentioned. Union Electric's current proposal is to do stroke time testing per ASME Section XI after adjusting of packing and then to check valve stem drag, as part of MCC testing, during refueling outages. As pointed out by the staff, such testing may not detect overtightening of packing during the interval between tests. Union Electric has not discussed this issue in their submittal. One of the Union Electric proposals made during the meeting was to limit packing loads to some predetermined value and to declare the valve inoperable if such a value were exceeded. However, the current Union Electric proposal involves no positive verification that the valve was left operable after packing loads are adjusted. The ASME Section XI stroke timing test is considered inadequate based on past experience. The Union Electric policy should be revised to provide the needed assurance of valve operability after any adjustment of valve stem packing or, for that matter, any substantial maintenance or adjustment of the valve assembly.