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Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Response to Safety Evaluation for Joint Owners' Group
Program on Periodic Verification of Motor-Operated
Valves (in Response to GL 96-05)

References: (1) Safety Evaluation on Joint Owners' Group Program on Periodic
Verification of Motor-Operated Valves Described in Topical Report
NEDC-32719 (Revision 2) dated 10/30/97
(2) Generic Letter 96-05, "Periodic Verification of Design Basis
Capability of Safety-Related Motor-Operated Valves", dated 9/18/96

Dear Madam or Sir:

On October 30, 1997, the Nuclear Regulatory Commission (NRC) issued the reference Safety Evaluation (SE) which, within the conditions and limitations described in the SE, stated that the staff considers the Joint Owners' Group (JOG) Program on Motor-Operated Valve (MOV) Periodic Verification an acceptable industry-wide response to Generic Letter (GL) 96-05. The JOG had agreed that after the issuance of the SE, requests would be made for participating utilities to notify the NRC of their plans to implement the JOG program described in Revision 2 of the topical report (NEDC-32719) which was the subject of the SE, and that any deviations from the JOG program would be justified.

By this letter, Illinois Power Company (IP) is providing its response to the SE. IP plans to continue participating in the JOG MOV Periodic Verification Program as a member of the Boiling Water Reactor Owners' Group, and hereby affirms its plans to implement the program elements described in Topical Report NEDC-32719, Revision 2.

However, as requested by the SE, it should be noted that IP's program deviates from the JOG program in one respect. In the JOG program as described in NEDC 32719

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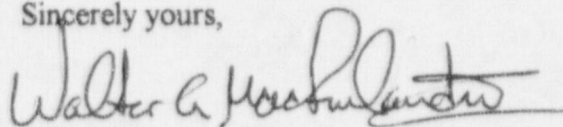
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(Rev. 2), the interval at which periodic testing is to be performed for each MOV is determined by categorizing each valve according to risk in one of three categories. That is, a valve's test interval is dependent on whether the risk significance for the valve is classified as "high", "medium" or "low". IP's program differs from the JOG program in that MOVs are simply categorized as "PRA" or "non-PRA."

Thus, under IP's program, only two categories are used (instead of three categories) to classify MOVs according to risk and thus determine the interval for periodic verification. (Risk significance, it should be noted is not the only factor for determining an MOV's test interval. The other factor used is the valve's thrust margin which is related to the difference between the measured available thrust and the adjusted required thrust for the valve.) Although only two risk categories are used under IP's program to determine a valve's test interval, a comparison of IP's program to the JOG program shows that the assignment of test intervals is conservative under IP's program. In general, the "PRA" classification under IP's program is equivalent to the "high" and "medium" classifications under the JOG program. This results in MOVs under IP's program being assigned test intervals that are equivalent to, or more conservative than, what would be assigned under the JOG program.

In conclusion, and in consideration of the conservative "deviation" described above, IP's MOV periodic test program is consistent with the JOG program as described in NEDC 32719 (Rev. 2) and reviewed by the NRC staff.

Sincerely yours,



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TBE/mlh

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