

October 29, 1999

MEMORANDUM FOR: Docket File

FROM: S. Patrick Sekerak, Project Manager, Section 1
 Project Directorate IV & Decommissioning
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation ORIGINAL SIGNED BY

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1;
 ARKANSAS NUCLEAR ONE;
 WATERFORD GENERATING STATION, UNIT 3 -
 ELECTRONIC TRANSMISSION OF ISSUES TO BE DISCUSSED
 IN AN UPCOMING TELEPHONE CONFERENCE RE: GENERIC
 LETTER 96-05 (GGNS TAC NO. M97051)

The attached questions were prepared by Steve Tingen of the NRR/Mechanical & Civil Engineering Branch, and electronically transmitted to Mr. Jerry Roberts and Mr. Guy Davant of Entergy Operations, Inc. on October 22, 1999 in preparation for an upcoming telephone conference.

This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position. Formal questions, if any, will be developed by the staff after the telephone conference with the licensees.

Docket Nos. 50-416, 50-313,
 and 50-382

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

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LETTER 96-05 (GGNS TAC NO. M97051)

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Issues for discussion with Entergy Operations, Inc. re: Generic Letter 96-05:

GRAND GULF

1. In your letter dated January 11, 1999, you committed to implement the JOG Program on MOV Periodic Verification as described in Topical Report NEDC-32719 (Revision 2). In an SE dated October 30, 1997, the NRC staff accepted the JOG program as an industry-wide response to GL 96-05 with certain conditions and limitations. The JOG program includes (1) the JOG interim static diagnostic test program, (2) the JOG 5-year dynamic test program, and (3) the JOG long-term periodic test program. The NRC staff considers your commitment to include all three phases of the JOG program.

Your letter dated March 17, 1997, describes static test frequencies that are based on MOV risk significance and setup margin. The static test frequencies range from 2 cycles to 6 cycles, not to exceed 10 years.

There appears to be a discrepancy between your letters dated March 17, 1997, and January 11, 1999, regarding the interim static test program test intervals. For example Topical Report NEDC-32719 requires that high risk/low margin valves be statically tested every refueling cycle. Your program requires that high risk/low margin valves be statically tested every two refueling cycles. Similar discrepancies exist for medium and low risk/low margin valves.

Discuss this discrepancy.

2. Your submittal dated April 2, 1999, describes your MOV risk ranking approach. Your risk ranking approach is described in the 1993 version of NEDC-32264. In your letter dated January 11, 1999, you committed to implement the JOG Program on MOV Periodic Verification as described in Topical Report NEDC-32719 (Revision 2). NRC Safety Evaluation, dated October 30, 1997, on NEDC-32719 (Revision 2), states that licensees that did not participate in the development of NEDC-32264, revision 2, must justify their MOV risk categorization methodology as part of their implementation of the JOG program. Discuss how you justified your methodology that is used to risk rank MOVs. (This was briefly discussed in the April 2, 1999, submittal but the NRC staff needs to understand the basis for your conclusion that the 1993 version of NEDC-32264 is equivalent to the revised version. The NRC staff reviewed the 1993 version of NEDC-32264 and had numerous comments that were resolved in revision 2. NRC SE dated February 27, 1997, approved the risk-ranking methodology described in NEDC-32264, revision 2.)

Discuss your plans to compare your list of risk-significant MOVs with the owners group list of risk-significant MOVs. If applicable, explain any differences between the owners list of risk-significant MOVs and your list of risk-significant MOVs.

Your submittals dated March 17, 1997 and April 2, 1999, describe risk ranking approaches. It appears that the approach described in the April 2, 1999, submittal is different than the approach described in the March 17, 1997 submittal. Discuss this inconsistency.

3. In its letter dated July 17, 1998, forwarding Technical Update 98-01, Limitorque indicates that a future technical update will be issued to address the application of dc-powered MOVs. If applicable, discuss any preliminary actions that have been taken to review dc-powered motor actuator capability.

Issues for discussion with Entergy Operations, Inc. re: Generic Letter 96-05:

ARKANSAS NUCLEAR ONE

1. In your letter dated January 11, 1999, you committed to implement the JOG Program on MOV Periodic Verification as described in Topical Report NEDC-32719 (Revision 2). In an SE dated October 30, 1997, the NRC staff accepted the JOG program as an industry-wide response to GL 96-05 with certain conditions and limitations. The JOG program includes (1) the JOG interim static diagnostic test program, (2) the JOG 5-year dynamic test program, and (3) the JOG long-term periodic test program. The NRC staff considers your commitment to include all three phases of the JOG program.

Your letter dated March 17, 1997, describes static test frequencies that are based on MOV risk significance and setup margin. The static test frequencies range from 2 cycles to 6 cycles, not to exceed 10 years.

There appears to be a discrepancy between your letters dated March 17, 1997, and January 11, 1999, regarding the interim static test program test intervals. For example Topical Report NEDC-32719 requires that high risk/low margin valves be statically tested every refueling cycle. Your program requires that high risk/low margin valves be statically tested every two refueling cycles. Similar discrepancies exists for medium and low risk/low margin valves.

Discuss this discrepancy.

2. Your submittal dated May 28, 1999, describes your MOV risk ranking approach. It appears that your approach is not consistent with the MOV risk ranking approach described in NEDC-32264. In your letter dated January 11, 1999, you committed to implement the JOG Program on MOV Periodic Verification as described in Topical Report NEDC-32719 (Revision 2). NRC Safety Evaluation, dated October 30, 1997, on NEDC-32719 (Revision 2), states that licensees that did not participate in the development of NEDC-32264 must justify their MOV risk categorization methodology as part of their implementation of the JOG program. Discuss how you justified your methodology that is used to risk rank MOVs.

Discuss your plans to compare your list of risk-significant MOVs with the owners group list of risk-significant MOVs. If applicable, explain any differences between the owners list of risk-significant MOVs and your list of risk-significant MOVs.

Issues for discussion with Entergy Operations, Inc. re: Generic Letter 96-05:

WATERFORD 3

1. In your letter dated January 11, 1999, you committed to implement the JOG Program on MOV Periodic Verification as described in Topical Report NEDC-32719 (Revision 2). In an SE dated October 30, 1997, the NRC staff accepted the JOG program as an industry-wide response to GL 96-05 with certain conditions and limitations. The JOG program includes (1) the JOG interim static diagnostic test program, (2) the JOG 5-year dynamic test program, and (3) the JOG long-term periodic test program. The NRC staff considers your commitment to include all three phases of the JOG program.

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There appears to be a discrepancy between your letters dated March 17, 1997, and January 11, 1999, regarding the interim static test program test intervals. For example Topical Report NEDC-32719 requires that high risk/low margin valves be statically tested every refueling cycle. Your program requires that high risk/low margin valves be statically tested every two refueling cycles. Similar discrepancies exist for medium and low risk/low margin valves.

Discuss this discrepancy.

2. Your submittal dated April 12, 1999, states that risk importance measures were calculated for the Category 1 and safety-related Category 2 MOVs. Discuss if Category 1 and safety-related Category 2 MOVs envelope all MOVs in your GL 96-05 program.

3. Your submittal dated April 12, 1999, describes your MOV risk ranking approach. It appears that your approach is not consistent with the MOV risk ranking approach described in NEDC-32264. In your letter dated January 11, 1999, you committed to implement the JOG Program on MOV Periodic Verification as described in Topical Report NEDC-32719 (Revision 2). NRC Safety Evaluation, dated October 30, 1997, on NEDC-32719 (Revision 2), states that licensees that did not participate in the development of NEDC-32264 must justify their MOV risk categorization methodology as part of their implementation of the JOG program. Discuss how you justified your methodology that is used to risk rank MOVs.

Your submittals dated March 17, 1997 and April 12, 1999, describe risk ranking approaches. It appears that the approach described in the April 12, 1999, submittal is different than the approach described in the March 17, 1997 submittal. Discuss this inconsistency.

Discuss your plans to compare your list of risk-significant MOVs with the owners group list of risk-significant MOVs. If applicable, explain any differences between the owners list of risk-significant MOVs and your list of risk-significant MOVs.

4. Your submittal dated April 12, 1999, states that MOV modifications are scheduled to be implemented during Cycle 10. What is the approximate date that Cycle 10 is scheduled to begin.