



Domestic Members

AmerenUE
Callaway
American Electric Power Co.
D.C. Cook 1 & 2
Arizona Public Service Co.
Palo Verde 1, 2 & 3
Constellation Energy Group
Calvert Cliffs 1 & 2
R. E. Ginna
Dominion Kewaunee
Dominion Nuclear Connecticut
Millstone 2 & 3
Dominion Virginia Power
North Anna 1 & 2
Surry 1 & 2
Duke Energy
Catawba 1 & 2
McGuire 1 & 2
Oconee 1, 2, 3
Entergy Nuclear Northeast
Indian Point 2 & 3
Entergy Nuclear South
ANO 1
ANO 2
Waterford 3
Exelon Generation Company LLC
Braidwood 1 & 2
Byron 1 & 2
Three Mile Island 1
FirstEnergy Nuclear Operating Co.
Beaver Valley 1 & 2
Davis Besse
FPL Group
St. Lucie 1 & 2
Seabrook
Turkey Point 3 & 4
Nuclear Management Co.
Palisades
Point Beach 1 & 2
Prairie Island 1 & 2
Omaha Public Power District
Fort Calhoun
Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
Progress Energy
Crystal River 3
H. B. Robinson 2
Shearon Harris
PSEG - Nuclear
Salem 1 & 2
South Carolina Electric & Gas Co.
V. C. Summer
Southern California Edison
SONGS 2 & 3
STP Nuclear Operating Co.
South Texas Project 1 & 2
Southern Nuclear Operating Co.
J. M. Farley 1 & 2
A. W. Vogtle 1 & 2
Tennessee Valley Authority
Sequoyah 1 & 2
Watts Bar 1
TXU Power
Comanche Peak 1 & 2
Wolf Creek Nuclear Operating Corp.
Wolf Creek

International Members

British Energy plc
Sizewell B
Electrabel
Doel 1, 2, 4
Tihange 1 & 3
Electricité de France
Kansai Electric Power Co.
Mihama 1
Takahama 1
Ohi 1 & 2
Korea Hydro & Nuclear Power Co.
Kori 1 - 4
Ulchin 3 - 6
Yonggwang 1 - 6
NEK
Krško
NOK
Kernkraftwerk Beznau
Ringshals AB
Ringshals 2 - 4
Spanish Utilities
Asco 1 & 2
Vandellós 2
Almaraz 1 & 2
Taiwan Power Co.
Maanshan 1 & 2

MPR-2524, Revision 0
Project Number 694
Project Number 691

August 4, 2006

OG-06-254

United States Nuclear Regulatory Commission
Document Control Desk
Washington DC 20555-0001

Subject: **Comments on JOG MOV PV Program Summary, MPR-2524, Revision 0, Draft Safety Evaluation (PA-SEE-0114)**

- References:
- (1) "Joint Owners' Group (JOG) Motor-Operated Valve Periodic Verification Program Summary", MPR-2524 Revision 0, dated February 2004
 - (2) NRC letter, "Request for Additional Information (RAI) on MPR-2524, Joint Owners' Group (JOG) Motor Operated Valve Periodic Verification Program Summary", from W. Macon, dated October 20, 2004.
 - (3) JOG letter, "Joint Owners Group Program on Motor-Operated Valve Periodic Verification", dated February 8, 2005.
 - (4) JOG letter, "Supplement to JOG RAI Responses on MPR-2524", dated September 27, 2005.
 - (5) (Draft) "Final Safety Evaluation on Joint Owners' Group Program on Motor-Operated Valve Periodic Verification (TAC Nos. MC2346, MC2347, and MC2348)

The Joint Owners Group (JOG) previously submitted the Motor-Operated Valve (MOV) Periodic Verification (PV) Program Summary (Reference 1) for NRC Review and acceptance. The NRC provided a Request for Additional Information (Reference 2) and the JOG responded with Reference 3. During a technical audit of the JOG MOV PV Program, the NRC requested supplemental information to support JOG's responses which was provided by JOG in Reference 4. The NRC JOG Program Project Manager provided the draft final safety evaluation (Reference 5) for review and comment prior to issuance of the final safety evaluation.

DO44
DO48

The purpose of this letter is to transmit comments on the draft safety evaluation (Reference 5). These comments offer suggested editorial changes and provide recommended changes to ensure a clear interpretation of the safety evaluation.

COMMENTS:

1. SE, first page, "Mr. Frederick P. Schiffley, II, Chairman, Westinghouse Owners Group..." and "Mr. Howard Crawford, Chairman, B&WOG..."

Comment:

The Westinghouse Owners Group has combined with the B&WOG. Mr. Frederick P. Schiffley, II is now "Chairman, PWR Owners Group" and there is now no need to include Mr. Howard Crawford.

2. SE Section 4.2.2 on page 16, first paragraph, "...the NRC considers that the JOG recommendations might need to be modified if operating experience reveals coefficients of friction that exceed program thresholds through long-term trends."

Comment:

The JOG MOV PV program will not continue into the future, so the NRC should recognize that any modifications to the JOG recommendations will be the responsibility of the licensees as the NRC better stated on page 17 at the end of the first full paragraph: "Licensees are responsible for addressing such updates and operational experience when implementing the JOG program."

3. SE Section 4.2.3 on page 19, second full paragraph, "...In its February 2005 RAI response, the JOG noted that all of the JOG methods require that two or more valves be tested. The JOG stated that these methods require a minimum of four data samples, obtained from no less than two valves. In addition, the JOG determined that these tests ensure that the required thrust is conditioned to a stable plateau. In its September 2005 supplemental RAI response, the JOG provided additional discussion of the use of four data points in the grouping criteria. The NRC staff finds the JOG supporting basis for valve grouping to be reasonable."

Comment:

The JOG wants to clarify that not all methods require four data samples (see MPR-2524, page 7-15, criterion 4.2). For example, Criterion 4.2 may be satisfied by testing two valves in accordance with Criterion 4.1c. In this case, two data samples would be required, but an allowance of 0.06 would be added to the coefficient of friction determined from the tests. JOG's RAI response was referring to other methods which may be used to satisfy Criterion 4.2. These methods do require a minimum of four data samples (but do not require the 0.06 coefficient of friction allowance be added).

4. SE Section 4.2.4 on page 20, third paragraph from the bottom of the page, "Condition B noted that the NRC staff had accepted a BWROG TR on MOV risk categorization..."


Comment:

Subsequent to the SE dated October 30, 1997 discussed in this section, the NRC issued an SE on the WOG MOV risk ranking methodology, as noted in the footnote 4 of MPR-2524 on page 2-2. The WOG methodology and the NRC's SE are References 7 and 8, respectively in MPR-2524. Therefore, the JOG considers that the draft SE should add "...and a WOG TR on MOV risk ranking methodology" to this discussion on Condition B.

Please note that while the NRC can impose implementation schedule compliance in the safety evaluation, the owners groups can only suggest implementation schedules for licensees. But as with all technical documents submitted and safety evaluations issued, compliance with the conditions in the documents is required prior to use unless specific exemptions are requested.

If you have any questions regarding the attached or the contents of this letter, please contact Reginald Dulaney at 412-374-6549 or any of the undersigned.

Regards,


for

Frederick P. "Ted" Schiffley, II
Exelon Nuclear
Chair, PWR Owners Group
(630) 657-3897


for

Randy C. Bunt
Southern Nuclear
Chair, BWR Owners Group
(205) 992-7475

cc: Tilda Liu, USNRC
David Terao, USNRC
Drew G. Holland, USNRC
John Grobe, USNRC
Girija Shukla, USNRC
William Macon, USNRC (4 copies)
Thomas G. Scarbrough, USNRC (5 copies)
Kenneth McCall (GE), BWROG Project Manager
Paul Damerell, MPR
Dennis Kreps (WEC), PWROG Project Manager
PMO