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SUBJECT: Comments on proposed Suppl 5 to Generic Ltr 89-10 re
 inaccuracy of motor-operated valve diagnostic equipment
 resulting from valve stem directional effects. Suppl should
 not be issued since industry aware of test results.

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 TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveillance"

NOTES: Application for permit renewal filed. 05000400

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PROPOSED GENERIC COMMUNICATION - NRC GENERIC LETTER 89-10, SUPPLEMENT 5:
INACCURACY OF MOTOR-OPERATED VALVE (MOV) DIAGNOSTIC EQUIPMENT RESULTING FROM
VALVE STEM DIRECTIONAL EFFECTS

RE: Federal Register Volume 57, No. 131, July 8, 1992

Gentlemen:

Carolina Power & Light Company appreciates the opportunity to review and provide comments on the proposed Generic Letter 89-10, Supplement 5. The following are comments provided for your consideration.

Review of the proposed Generic Letter 89-10, Supplement 5 determined that the primary subject was improper calibration and use of particular spring-pack displacement diagnostic equipment. However, each licensee was requested to review "any equipment" used to establish current torque switch settings for safety-related MOVs even though the Motor-Operated Valve Users Group (MUG) study and report results identify concerns of the use and methodology with certain diagnostic equipment.

As stated in the supplement, NUMARC and ITI-MOVATS have provided guidance, based upon the MUG study results, for licensees on addressing the effects of the increased uncertainty of that particular diagnostic equipment; and that the NRC staff found the guidance to be an acceptable approach for addressing the uncertainty resulting from the use of the ITI-MOVATS equipment. Also stated in the supplement is that some licensees have initiated their programs in response to Generic Letter 89-10 and have conducted a significant amount of testing of MOVs under design-basis conditions.

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Generic Letter 89-10, Supplement 5 reporting requirements appear to be redundant, with all the industry emphasis being placed on testing, verifying, evaluating, and trending of proper operation of MOVs to comply with Generic Letter 89-10 requirements, and the additional industry studies and guidance in this area.

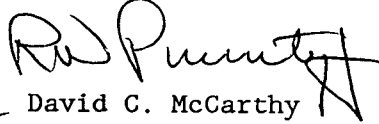
The information contained in the supplement is important to ensure MOVs perform their intended function; however, this information should be incorporated into Generic Letter 89-10 programs through normal engineering processes. The separate industry effort that will be expended to address the Supplement 5 reporting requirements will place an unnecessary burden on licensee resources, especially invoking 10CFR50.54(f) to a supplement. NRC inspections can easily determine that a plant is in compliance with the requirements and Technical Specifications.

As Information Notice 92-23 states, load-sensitive behavior (i.e., rate of loading effects) is independent of the type of MOV diagnostic equipment used. The load-sensitive behavior information mentioned in the discussion paragraph does not add to the technical or safety significance of Supplement 5 information and, therefore, should be removed.

In summary, Generic Letter 89-10, Supplement 5 appears unnecessary and should not be issued since the industry is aware of the MUG test results and of the guidance document to address proper diagnostic equipment use. The industry should continue to use this and other information that is identified through industry efforts to continually improve and enhance their programs. NRC staff inspections will be able to determine compliance on an individual basis and take corresponding actions.

Should you have any questions regarding this response, please contact Mr. Fred Emerson at (919) 546-7573.

Yours very truly,


for David C. McCarthy
Manager
Nuclear Licensing Section

JHH/jbw

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