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 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Powe 05000324
 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Powe 05000325
 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
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 SUBJECT: Responds to Generic Ltr 89-010 re safety-related
 motor-operated valve testing & surveillance.
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 TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveill
 NOTES: Application for permit renewal filed. 05000400

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DEC 27 1989

R. A. WATSON
Senior Vice President
Nuclear Generation

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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RESPONSE TO NRC GENERIC LETTER 89-10
SAFETY-RELATED MOTOR-OPERATED VALVE TESTING AND SURVEILLANCE

Gentlemen:

On June 28, 1989, the NRC staff issued Generic Letter 89-10 which extended the scope of the motor-operated valve (MOV) program outlined in Bulletin 85-03, dated November 15, 1985, and Supplement 1 of Bulletin 85-03, dated April 27, 1988, to include all safety-related MOVs as well as all position-changeable MOVs. The Generic Letter recommends that licensee's programs with respect to MOVs should provide for the testing, inspection, and maintenance of MOVs so as to provide the necessary assurance that they will function when subjected to the design-basis conditions that are considered during both normal operation and abnormal events within the design basis of the plant. Generic Letter 89-10 also states "NRC envisions that, as part of a good maintenance program, other MOVs in the balance of plant should be considered for inclusion in the program, commensurate with the licensee's assessment of their importance to safety." The Generic Letter requires licensees to advise the NRC within six months of the date of the Generic Letter whether the recommendations and schedule specified will be met.

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Carolina Power and Light Company (CP&L) has formed an MOV task group, which consists of representatives from each of CP&L's nuclear plants, as well as representatives from the Nuclear Engineering Department, the Nuclear Licensing Section, and the Corporate Nuclear Safety Section, to facilitate the development and implementation of Generic Letter 89-10 activities. CP&L has reviewed Generic Letter 89-10 and has developed a corporate action plan to comply with the expanded scope and additional MOV program requirements recommended by the Generic Letter which will apply to each of CP&L's nuclear plants. CP&L is in the process of identifying safety-related and position-changeable MOVs in order to determine the full scope of the MOV program. CP&L then plans to implement this program at each plant within 5 years or 3 refueling outages, whichever is later. However, it should be recognized that the results of clarifications of the MOV issues addressed below may impact this schedule.

As identified in the Nuclear Management and Resources Council (NUMARC) letter dated November 17, 1989, from Mr. Thomas E. Tipton to Dr. Thomas Murley of the NRC Office of Nuclear Reactor Regulation, inconsistencies and ambiguities exist with respect to the MOV issue. In addition, CP&L is aware of ongoing industry activities relative to the MOV issue, involving participation of all four nuclear steam supply system owners' groups, the Electric Power Research Institute, and NUMARC, in developing an industry-wide MOV testing program. CP&L supports the concept of an industry program to address the requirements of the Generic Letter. Such a program would be beneficial in assuring consistency in individual licensee MOV programs. CP&L believes the NUMARC items should be resolved and the industry initiatives further developed prior to CP&L specifically committing to the recommended actions and implementation schedules required by Generic Letter 89-10.

Therefore, CP&L will provide more detailed information about our MOV program to NRC after evaluation of ongoing industry group efforts and NRC responses to the NUMARC letter. It is CP&L's intent to comply with the schedules specified in the Generic Letter to the extent possible. CP&L will continue in the interim to vigorously pursue further development and initial implementation of our action plan for compliance with Generic Letter 89-10. Regardless of these issues, CP&L remains committed to implementation of an MOV program that will ensure the operability of safety-related MOVs at each of our nuclear plants.

As stipulated in Generic Letter 89-10, the new actions specified in the Generic Letter supersede those actions specified in Bulletin 85-03. CP&L's completed program changes and actions with regard to Bulletin 85-03 will remain in effect until they are superseded by actions taken pursuant to

Generic Letter 89-10. As requested by Generic Letter 89-10, no further submittals required by current Bulletin 85-03 commitments will be made. In addition, any additional pending items will be considered for incorporation into the Generic Letter 89-10 MOV program.

Yours very truly,

R A Watson

R. A. Watson

JCP/bjw (559CRS)

cc: Mr. R. A. Becker
Mr. S. D. Ebnetter
Mr. L. Garner (NRC - HBR)
Mr. R. Lo
Mr. W. H. Ruland
Mr. J. E. Tedrow
Mr. E. G. Tourigny

R. A. Watson, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Notary (Seal)

My commission expires: February 18, 1990

Zelma T. Ausley

