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SUBJECT: Informs of rev to scope of program for testing, insp & maint  
of MOVs, per 891228 & 911031 responses to GL 89-10, "Safety-  
Related MOV Testing & Surveillance." Inactive non-gate/  
globe/butterfly & MOVs excluded from revised program scope.

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

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**DUKE POWER**

March 23, 1993

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Oconee Nuclear Station  
Docket Nos. 50-269,-270,-287  
Generic Letter 89-10 "Safety-Related Motor-Operated Valve  
Testing and Surveillance"  
Revision to Program Scope

By letter dated December 28, 1989 as supplemented on October 31, 1991, Duke provided the response to Generic Letter (GL) 89-10 "Safety-Related Motor-Operated Valve Testing and Surveillance." GL 89-10 included recommendations regarding the scope of a program for the testing, inspection, and maintenance of MOVs. Specifically, GL 89-10 recommended inclusion of safety-related MOVs and position-changeable MOVs as a minimum. NRC Inspection Report 50-269,-270,-287/91-13 documents the results of the NRC MOV team inspection at Oconee. Section 3.a of the inspection report describes the selection of MOVs for the Oconee GL 89-10 program, including position changeable MOVs, and certain Emergency Feedwater and cold shutdown MOVs.

In the December 28, 1989 response to the GL, the scope of the Oconee GL 89-10 program was described as including only events within our existing, approved design basis. This description inferred that each MOV included in the program was required to move to accomplish a design basis function (e.g., active valves). For example, the program description inferred that by definition, position-changeable MOVs were part of the Oconee design basis.

The Oconee GL 89-10 program has undergone further review with respect to the scope of the program recommended by GL 89-10 (and its supplements). As a result, the scope of the Oconee GL 89-10 program will be limited to active gate, globe, and butterfly valves. Non-gate/globe/butterfly valves and MOVs which are not active valves have been excluded from the revised program scope as follows:

- Non-gate/globe/butterfly valves (i.e., ball and diaphragm valves) have been excluded from the revised program scope based on GL 89-10, Supplement 1, Question 3.
- MOVs which are not active valves (e.g., valves not required to move to accomplish a design basis function) had previously been included within the scope of the GL 89-10 program. Inclusion of MOVs which are not active valves goes beyond the existing plant design basis. GL 89-10 recommended action "e" clearly limits the scope of the program to

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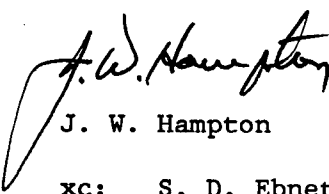
the existing plant design basis: "no change to the existing plant design basis is intended and none should be inferred."

- Position changeable MOVs, as defined by the GL, are not included within the revised program scope (unless they are active valves) since the Oconee licensing basis considers the postulated mispositioning to be the single failure. This basis is clearly established by the December 27, 1974 Order for Modification of the Oconee Facility Operating License which states that the single failure evaluation for ECCS must consider the effects of a single failure or operator error that causes any manually controlled, electrically-operated valve to move to a position that could adversely affect the ECCS. GL 89-10 recommended action "e" clearly limits the scope of the program to the existing plant design basis. Valve mispositioning coincident with an additional single failure has never been established as a design basis requirement for Oconee. In Supplement 4 to GL 89-10, the NRC indicated that position changeable valves would no longer be within the scope of GL 89-10 for BWRs, and that a similar change was being considered for PWRs.

Based on the above, the revised program scope is considered to meet the intent of the GL. The probabilistic risk assessment will continue to be used to prioritize testing schedules. Documentation for exclusion of MOVs from the program scope will be maintained in engineering calculation files.

MOVs excluded from the revised GL 89-10 program scope will continue to be maintained in accordance with the normal preventative maintenance program and 10 CFR 50, Appendix B.

Very Truly Yours,



J. W. Hampton

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