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AUTH. NAME AUTHOR AFFILIATION
 HAMPTON, J.W. Duke Power Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Submits request for closure for GL 89-10, "SR MOV Testing & Surveillance."

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

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Duke Power Company
Oconee Nuclear Site
P.O. Box 1439
Seneca, SC 29679

J. W. HAMPTON
Vice President
(803)885-3499 Office
(803)885-3564 Fax



DUKE POWER

December 12, 1994

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"
Request for Closure of Generic Letter 89-10

Representatives from Duke Power Company's Oconee Nuclear Station (ONS) discussed the intent to achieve closure of Generic Letter 89-10 during a NRC (Region II)/Duke Meeting on October 24, 1994. Based on the information presented in the October 24th meeting with NRC Region II, ONS requests closure of Generic Letter 89-10 in accordance with item "m" of the Generic Letter. This closure is requested while recognizing that a small number of outstanding Motor-Operated Valve (MOV) commitments exist which will be completed under the ongoing Generic Letter (GL) 89-10 program.

A summary of the information presented in the October 24th meeting supporting the closure of Generic Letter 89-10 at ONS is provided:

Attachment 1 illustrates the numerical distribution of MOVs for which "Stage 2 Verification" has been completed. These valves are categorized as follows:

* DP TESTED consists of those MOVs that were; 1) DP tested in-situ (either instrumented or uninstrumented), 2) flow loop tested, or 3) where a static test demonstrates design-basis capability.

* GROUPING consists of MOVs falling within similarity studies and extrapolation reports based on flow testing of other similar MOVs.

* EPRI includes those MOVs whose calculations have valve factors and rate of loading margins that bound the flow loop and in-situ test results of the Electric Power Research Institute (EPRI) MOV Performance Prediction Program.

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* REMOVING indicates those MOVs that will be removed from the Generic Letter 89-10 program due to modifications which place the valves outside the scope of applicability of the GL 89-10 program.

* COMMITMENT indicates those MOVs that can not be in-situ tested and where ONS is not entirely satisfied with the existing set-up basis. Further Station action is required for these MOVs to meet the intent of GL 89-10 (as shown in Attachment 2).

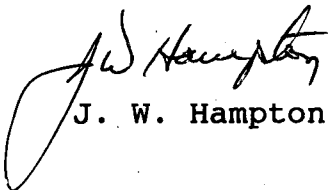
Since the October 24th meeting, ONS has reviewed current system testing and determined that certain MOVs are routinely stroked at design basis conditions. This MOV testing has been incorporated into Attachment 1. Attachment 1 reflects the projected status as of the original ONS commitment date (for completion of GL 89-10 program requirements) of 12/28/94.

Attachment 2 provides more specific information regarding the MOVs falling under the COMMITMENTS category of Attachment 1. Operability calculations have been completed for these MOVs and are on file at ONS. The information in Attachment 2 includes the planned actions to enhance the margin of these MOVs as well as the schedule for implementation of these actions. The implementation schedule is based upon current unit outage predictions and lead time for parts procurement. This attachment, titled "Proposed Post 1994 Actions", was presented at the October 24th meeting to NRC Region II.

Attachment 3 indicates the items removed from the ONS list of "Proposed Post 1994 Actions" since the October 24th meeting.

If you have any questions or need further information you may contact D. A. Nix at (803) 885-3634.

Very truly yours,



J. W. Hampton

attachments

U. S. Nuclear Regulatory Commission
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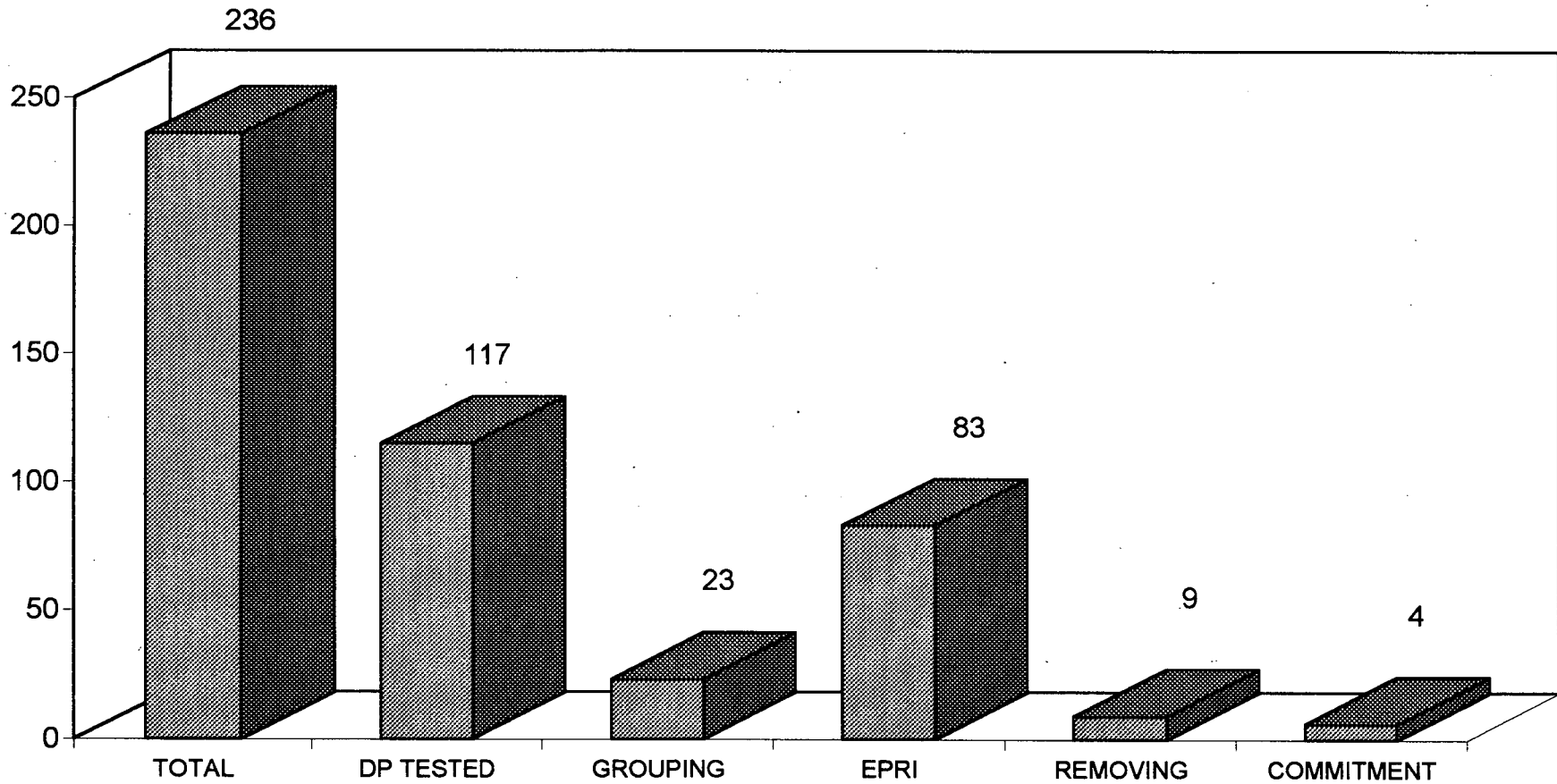
xc (w/attch): Mr. L. A. Wiens
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. S. D. Ebnetter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission

Mr. P. E. Harmon
Senior NRC Resident Inspector
Oconee Nuclear Station

Mr. Virgil R. Autry
Bureau of Radiological Health
SC Dept. of Health & Environmental Control
2600 Bull St.
Columbia, SC 29201

Stage 2 Verification



Proposed Post 1994 Actions

GLOBES

1BS-2	Motor Change	10/1/95
1HP-20	MOV Replacement	5/1/97
2BS-1	Motor Change	4/1/96

BUTTERFLIES

LPS-139	MOV Replacement	1995
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Attachment 3

Changes From "Proposed Post 1994 Actions" List Dated 10/21/94

The following MOVs have been justified based on incorporating the results of the EPRI MOV Predictive Performance Program.

1HP-409	1RC-4
1HP-410	3RC-4
2HP-409	
2HP-410	

The following MOVs are tested at their design basis conditions during normal system testing.

CCW-8	1PR-15	3LP-1
1CCW-1	1PR-19	3LP-2
1CCW-2	2PR-15	
1CCW-3	2PR-19	
1CCW-4	3PR-15	
1CCW-5	3PR-19	
1CCW-6		
2CCW-7		
3CCW-93		

The following MOVs will have a similarity study completed by 12/28/94.

1CC-7
2CC-7
3CC-7