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SUBJECT: Provides response to GL 95-07, "Pressure Locking & Thermal Binding Of Safety-Related Power-Operated Gate Valves."

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DUKE POWER

October 16, 1995

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Subject: McGuire Nuclear Station Units 1 & 2
Docket Nos. 50-369, 370
Catawba Nuclear Station Units 1 & 2
Docket Nos. 50-413, 414
Oconee Nuclear Station Units 1, 2, & 3
Docket Nos. 50-269, 270, 287
Response to Generic Letter 95-07: Pressure Locking and Thermal Binding
of Safety-Related Power Operated Gate Valves

Gentlemen:

Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-Related, Power-Operated Gate Valves," dated August 17, 1995, requires certain actions be taken by utilities regarding the susceptibility and evaluation of power-operated gate valves to the phenomena of pressure locking and thermal binding.

The generic letter has two requested actions. First, within 90 days, identify the valves which are **potentially** susceptible to pressure locking and thermal binding, and provide a basis for their operability. Second, within 180 days, perform further analysis to identify valves that are susceptible and implement corrective actions, with justification for longer implementation schedules, if needed.

The responses required of utilities were: a 60-day response providing the extent of intended implementation of the requested actions, and alternate course of action as appropriate; and a 180-day response documenting the second requested action by providing the following requested information:

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1. Description of susceptibility evaluations, analysis, and the susceptibility criteria used.
2. Evaluation results, including a list of susceptible valves.
3. Corrective actions identified, schedules, and justifications of operability as appropriate.

This submittal is to document Duke Power's 60-day response regarding our intent in meeting the requirements of the Generic Letter 95-07.

During our initial investigation, we have determined that generally accepted evaluation criteria are not readily available and we are aware of no comprehensive test effort to validate susceptibility criteria. In order to respond in a timely manner, we will utilize reasonable evaluation methods to identify those applications susceptible to failures similar to those documented through the industry operating experience program. Screening criteria will be based upon generally recognized pressure locking and thermal binding failure modes and validated industry experience. Future actions may be taken contingent on input provided by the Westinghouse Owners Group, NRC Workshops, or other utility test programs.

Duke Power is participating in activities commissioned by the Westinghouse Owners Group in order to assist us in providing a timely and complete response to the generic letter. In part, the program will establish a common set of criteria which can be applied in the screening and evaluation of the pressure locking and thermal binding phenomena. Most of the NSSS systems, as well as many of the valves in those systems, are common among the various Westinghouse plants. Thus, it is beneficial and cost effective, to both WOG members and the NRC, to utilize the expertise of the member utilities and Westinghouse to develop a consistent, effective, and comprehensive set of screening and evaluation criteria that can be used by all WOG plants. To this end, a task team of WOG members has been formed as a part of this program and is in the process of developing the criteria.

A set of screening criteria will be defined to identify valves potentially susceptible to pressure locking and thermal binding, taking into account both component and systems considerations. Criteria and methodology are also being developed to identify those valves that are susceptible to pressure locking and thermal binding. As susceptible valves are identified, the evaluation criteria and methodology will be used to determine the impact on valve safety function capability and the need for corrective actions.

Because of the complexity in completing further evaluations to determine what effect pressure locking and thermal binding may have on valve operability, it is felt that the resources can be more appropriately and productively focused on meeting the requested 180-day actions and waive the requested 90-day actions. The WOG Task Team has established an aggressive schedule for the criteria development for valves susceptible to pressure locking and thermal binding. Even with this aggressive schedule, the operability assessments can be most effective if they are concentrated on only those valves which are identified as being susceptible to pressure locking or thermal binding.

If at any time the susceptibility evaluation identifies a valve as having an operability concern due to either pressure locking or thermal binding, and corrective actions have not been taken, an operability assessment will be made. If operability cannot be demonstrated, the applicable technical specification actions will be followed.

Because of the lack of generally accepted industry screening criteria, the fact that the number of valves requiring evaluation per unit at Duke Power is significantly greater than the industry average, and the inefficiencies in performing interim operability evaluations on valves that are only **potentially** susceptible to pressure locking or thermal binding, we do not plan to meet the 90-day Requested Action. The overall intent of a timely response to the concerns documented in the Generic Letter will be met, however, within the 180-day schedule identified in the Generic Letter.

Duke Power will comply with the actions and responses specified in the 180-day required response by completing and documenting the following:

- Screening criteria
- List of susceptible valves
- Description of evaluation
- Susceptibility evaluation results
- Corrective actions taken or scheduled
- Justifications for continued operability, as needed

These actions will be completed and the responses provided to the NRC within the 180 days requested in Generic Letter 95-07.

I declare under penalty of perjury that these statements are true and correct to the best of my knowledge.

Should you have any questions regarding this submittal, please contact S. D. Hart at (704) 382-3925.

Very truly yours,



M. S. Tuckman
Senior Vice President
Nuclear Generation

U.S. NRC
October 16, 1995
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