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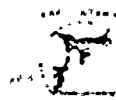
ACCESSION NBR: 8710160070 DOC. DATE: 87/10/09 NOTARIZED: NO DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME AUTHOR AFFILIATION
 KOBER, R. W. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 KANE, W. F. Region 1, Office of Director

SUBJECT: Forwards addl response to IE Bulletin 85-003. Program to
 comply w/bulletin patterned after Callaway program & uses
 methodology & equipment of MOVATS, Inc.

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ROGER W. KOBER
VICE PRESIDENT
ELECTRIC PRODUCTION

TELEPHONE
AREA CODE 716 546-2700

October 9, 1987

Mr. William F. Kane, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: Request for Additional Information
IEB-85-03 "Motor Operated Valve..."
dated November 15, 1985
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Kane:

Your letter dated September 9, 1987 which was received on September 14, 1987 requested additional information concerning our IEB-85-03 response within 30 days. Attached is our response to your request.

In reviewing our response you will note that the Rochester Gas and Electric program to comply with IEB 85-03 is patterned after the Callaway program and uses the methodology and equipment of MOVATS, Inc. Testing the IEB 85-03 valves will begin soon. Please inform us if you have any concerns with this approach to satisfying the IEB 85-03 requirements.

Very truly yours,

Roger W. Kober

Attachment

xc: U.S. NRC Document Control Desk (original)

Resident Inspector

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ATTACHMENT

REQUEST FOR ADDITIONAL INFORMATION IE BULLETIN 85-03

NRC Request

1. MOVs 826A, 826B, 826C and 826D are shown normally closed in two parallel suction lines leading from the boric acid tanks of the SI System, in Zone G-2 of Drawing 33013-1262, Revision 3. Referring to Table 1 of the response of 05-14-86, note that one of these valves per path is normally open. Please address this apparent discrepancy between the P&ID and the response.

Response

The purpose of the P&ID was to provide the reader with a one line drawing of the system that illustrated the valves, pumps, and piping associated with the system. The revision level of the P&ID provided did not contain information associated with normal valve position. Therefore, the P&IDs provided cannot be used to verify valve position listed in Table 1. Since that time, the P&IDs have been revised to illustrate normal valve position at power. Copies of the revised P&IDs can be provided upon request.

NRC Request

2. Has water hammer due to valve closure been considered in the determination of pressure differentials? If not, please explain.

Response

The effect of water hammer has not been considered in the determination of valve closure pressure differentials. Consistent with the Westinghouse Owners Group position (WOG letter OG-87-21, dated April 15, 1987 on "Westinghouse Owners Group - Safety Related MOV Program Final Report, IE Bulletin 85-03 - NRC Comments"). The conditions necessary to cause steam void class water hammer are considered highly unlikely to exist in the fluid systems impacted by IEB 85-03. Therefore, water hammer and its possible effects on the determination of maximum fluid differential pressures was not explicitly addressed in the RG&E 180 Day Response to IEB 85-03. In addition, the effects of water hammer occur over a very brief period of time. Superimposing the event requiring actuation of safeguards equipment with the effects of a postulated water hammer (in effect assuming both maximum pressures and minimum pressure effects simultaneously) is unnecessarily restrictive in determining valve switch settings and may lead to settings that could impair valve operability during normal operation. Therefore, it is RG&E's position that this issue need not be addressed within the context of IE Bulletin 85-03.

NRC Request

3. In addition to resolving the preceding comments, please expand the proposed program for action items b, c, and d to include the following details as a minimum:
- (a) commitment to a training program for setting switches, maintaining valve operators, using test equipment and interpreting test results,
 - (b) commitment to justify continued operation of a valve determined to be inoperable, and
 - (c) description of a method possibly needed to extrapolate valve stem thrust determined by testing at less than maximum differential pressure.

Response

- 3a. The MOVATS methodology and equipment will be used to ensure operability of the IEB 85-03 Safety-Related Motor Operated Valves. A group of RG&E individuals has been trained by MOVATS in the use of test equipment and interpretation of test results. Individuals have also been trained by LIMITORQUE in maintaining valve operators. A Safety-Related Motor Operated Valve Program patterned after the Callaway program has been developed to provide guidance for switch settings. Initially, the test team will perform under the observation of MOVATS personnel. As more experience and confidence is developed by the RG&E team, the participation of MOVATS personnel will be reduced to the role of a consultant. The test team retraining will be part of the maintenance training program.
- 3b. The MOVATS methodology and equipment will be used to assess the condition of the designated valves. The Ginna Test Procedures contain a list of degradations that, if found, may result in declaring the valve inoperable until corrected. If a valve is declared to be inoperable, the limiting conditions described in the Ginna Technical Specifications will be applied.
- 3c. The MOVATS methodology will be used to determine the proper switch settings for the MOVs. When tests are done at less than maximum differential pressure, the stem thrust due to the differential pressure will be measured for two partial pressure points. The stem thrust at the maximum differential pressure point will be extrapolated using a linear interpolation between the zero point and the test points. This thrust will be added to the running load to determine the total thrust at maximum differential pressure. The total thrust will be increased by the appropriate MOVATS measurement uncertainty factor and the MOV switches set accordingly.

