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 MECREDY,R.C. Rochester Gas & Electric Corp.
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SUBJECT: Informs NRC of util plans to address recommendations of
 Generic Ltr 89-10.

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

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U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Response to Generic Letter 89-10 (6 Month)
Safety-Related MOV Testing and Surveillance
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Reference: (1) RG&E letter dated July 8, 1988 from R.E. Smith to
C. Stahle, "IE Bulletin 85-03 Report Summarizing
Program Completion"
(2) NRC letter dated May 23, 1989 from J.P. Durr to R.C.
Mecredy, "Inspection 50-244/89-05"
(3) Toledo Edison letter dated April 22, 1987 from Joe
Williams to USNRC, "Davis Besse MOV Reliability
Improvement Program"

Dear Mr. Johnson:

Generic Letter 89-10 requires each licensee to notify the NRC within 6 months of the date of the letter of any date or recommendation specified in Generic Letter 89-10 that will not be met. The purpose of this correspondence is to inform the NRC of Rochester Gas and Electric Corporation's (RG&E) plans to address the recommendations of Generic Letter 89-10.

RG&E intends to meet the recommendations of Generic Letter 89-10 with a program similar to that submitted to the Staff by Reference 1 and subsequently approved by the Staff by Reference 2. The Program will be expanded to include MOVs in safety-related systems that are not blocked from inadvertent operation from either the control room, motor control center, or the valve itself. The following safety-related systems will be included in the Program:

- High Head SI - Injection Mode
- Low Head SI - Injection Mode
- High Head SI - Recirculation Mode
- Low Head SI - Recirculation Mode
- Auxiliary Feedwater
- Standby Auxiliary Feedwater
- Containment Spray
- Component Cooling Water - SI and RHR Pump Cooling;
Sump Recirculation Cooling
- Service Water - Non-essential Load Isolation

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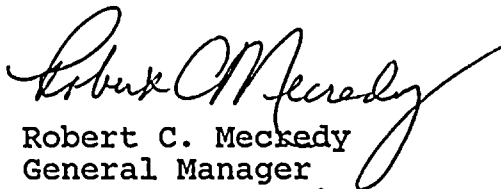
MOVs in the above systems will be tested at design pressure when practical. The design pressure may be hydrostatically developed. If full pressure testing cannot be achieved, an explanation of the constraints to full pressure testing will be documented along with a description of the alternate method used to ensure MOV operability. Typically, for such cases, partial pressure testing will be performed and the results conservatively extrapolated to the design basis conditions. Experience in setting MOVs based on simulated design conditions indicates that extrapolation from less-than-design pressure test results can provide conservative and reliable MOV settings when suitable signature analysis diagnostic techniques are employed (Reference 3). This is to be expected because the forces at work to constrain valve stem motion are primarily linear, i.e., friction. Partial pressure testing would be performed as near to design pressure as practical since the accuracy of torque settings based on testing at less-than-design pressure is improved as the test pressures approach design pressure. Use of partial pressure testing and extrapolation of test data as an alternate method when design conditions cannot be achieved practically will consider uncertainties on required stem thrust associated with test measurements as well as non-linear influences such as fluid dynamic effects caused by low subcooling of the working fluid relative to the velocity pressure losses through the valve. Another alternative to testing an MOV at full design pressure may include reviewing existing test data of an identical MOV and applying the test results as appropriate.

In-plant MOV data will be trended periodically upon completion of preventive maintenance and diagnostic testing activities. In addition, if corrective maintenance performed warrants a retest, the results shall be included in the trending program. Therefore, MOV trends will be examined as a minimum following regularly scheduled surveillance or more often as dictated by maintenance history. Industry MOV data will be reviewed as information is received for affects on RG&E's MOV program.

Valve testing will be scheduled based on plant conditions which allow development of the specified differential pressure and isolation of equipment when required. Some valves can be tested during normal plant operation. Others can and must only be tested during shutdown conditions. It is intended to complete the Program within five years from the date of the letter, however, testing of valves that require a shutdown may not be completed until the following Spring Refueling Outage. Our intent is not to extend outages for the sole purpose of performing MOV testing. It is doubtful that the state Public Service Commission would deem this to be a prudent action. In addition, should prototypical type testing become necessary, our program cannot be completed until appropriate equipment and facilities become available. If this becomes necessary, a list of affected valves, if any, and a targeted schedule for prototype testing; will be provided as is required.

The Program will demonstrate the operability of selected MOVs. The Program will not address motorized dampers since these devices are not explicitly described in Generic Letter 89-10.

Very truly yours,


Robert C. Meckedy
General Manager
Nuclear Production

RWE\070
Enclosure

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Washington, D.C. 20555

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Ginna Senior Resident Inspector