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 RECIP. NAME: RECIPIENT AFFILIATION
 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Informs NRC per item 1 of GL 89-10 that testing associated w/safety-related MOV program will not be completed until 950628 for listed reasons. Notifies that MOVs 700, 701, 720 & 721 excluded from program, per Suppl 1 to GL 89-10.

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

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February 3, 1994

U.S. Nuclear Regulatory Commission
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Attn: A.R. Johnson
Project Directorate I-3
Washington, DC 20555

Subject: Update to Generic Letter 89-10 Response, Safety-Related
Motor-Operated Valve Testing and Surveillance
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

- References:
- (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Response to Generic Letter 89-10 (6 Month) Safety-Related MOV Testing and Surveillances", dated December 28, 1989.
 - (b) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Change to the IEB 85-03 Program", dated March 22, 1990.
 - (c) NUMARC 93-05, "Guidance for Optimizing Safety Benefits in Assuring the Performance of Motor-Operated Valves", December 1993.
 - (d) Cooperative Efforts Group Meetings with NRC, Subject: "Graded Approach Program for Safety-Related Motor-Operated Valve Testing", dates June 7, 1993 and October 18, 1993.
 - (e) NRC Inspection Report No. 50-244/92-80, Subject: "Motor-Operated Valve Inspection at R.E. Ginna Nuclear Power Plant", dated May 14, 1992.

Dear Mr. Johnson,

Rochester Gas and Electric (RG&E) notified the NRC in References (a) and (b) that all design basis reviews, analyses, verifications, tests and inspections of safety-related motor-operated valves (MOVs) which were required in order to address the concerns raised in Generic Letter (GL) 89-10 were expected to be completed prior to June 28, 1994. The purpose of this letter is to inform the NRC in accordance with item 1. of GL 89-10 that testing associated with this program will not be completed until June 28, 1995 for the reasons outlined below.

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Since the release of GL 89-10 (and IEB 85-03), RG&E has been actively involved in developing an MOV program in order to address the generic issues raised by the NRC. This included performing the necessary design basis reviews and analyses to determine the functions and testing requirements for each safety-related MOV. Static and dynamic testing of these MOVs was also initiated beginning in 1989. However, testing practices have significantly and continually evolved since the release of GL 89-10 based on industry and staff research and testing (including the EPRI Performance Prediction Program). Despite an aggressive testing program, many valves have had to be retested using improved technology in order to reflect the findings obtained from the industry and staff efforts. Consequently, RG&E has determined that dynamic testing (i.e., Δp testing) of all safety-related MOVs determined to be within the scope of GL 89-10 cannot be completed prior to June 28, 1994.

RG&E informed the NRC in Reference (a) that outages would not be extended for the sole purpose of performing MOV testing since this was not considered a prudent action. RG&E continues to adopt this practice while attempting to complete as much MOV testing as can be practically and safely accomplished. The MOVs which remain to be dynamically tested have been evaluated using the guidance contained in NUMARC 93-05 (Reference (c)). Based on the results of the Ginna Station Level 1 PRA, all MOVs were ranked according to their importance with respect to preventing and mitigating core damage. The MOVs were also evaluated using deterministic criteria to ensure that all functions which the valve was expected to perform were adequately addressed by the PRA. The results of this review was then used to prioritize the testing of MOVs contained within the GL 89-10 program.

The following is the current status of the Ginna Station GL 89-10 program:

1. 61 safety-related MOVs are contained within the program.
2. 24 MOVs were determined to be risk-significant. Of these, 7 are excluded from testing as follows:
 - a.) 4 MOVs cannot be dynamically tested without significant plant modifications and/or potential personnel hazard (see GL 89-10, item c.).
 - b.) 2 MOVs have no Δp testing requirements (i.e., 0 Δp).
 - c.) 1 MOV will not be dynamically tested due to the significant margin which is available (i.e., no meaningful data would be gained from Δp testing).
3. 37 MOVs were determined to have low risk-significance. Of these 4 are excluded from testing as follows:
 - a.) 4 MOVs have no Δp testing requirements (i.e., 0 Δp).

RG&E will complete dynamic testing of the 17 risk-significant MOVs that require testing prior to June 28, 1994. Therefore, all risk-significant MOVs will either be dynamically tested prior to the original commitment date or have sufficient basis for not requiring this testing.

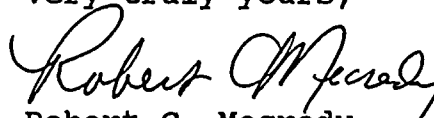
The low risk significant MOVs will either be dynamically tested or grouped with valves that will be tested prior to June 28, 1995. RG&E has initially grouped the low risk significant valves utilizing available staff guidance (e.g., draft Supplement 6 to GL 89-10) and expects to dynamically test at least one valve from each group prior to June 28, 1994. It is expected that 21 of the 33 low risk significant MOVs which require dynamic testing will be tested prior to the original commitment date. The remaining 12 MOVs have been initially grouped with valves that are expected to be tested.

All MOVs contained in the GL 89-10 Program will also be statically tested prior to June 28, 1994. The MOVs which have not been dynamically tested have been evaluated using available industry information and plant-specific experience to ensure that the MOVs will perform their intended safety function. This information and the basis for ranking the importance of each MOV is retained by RG&E in accordance with item 1. of GL 89-10.

It should be noted that in Inspection Report 92-80 (Reference (e)), RG&E committed to review the exclusion of MOVs 700, 701, 720, and 721 from the scope of GL 89-10. These MOVs are used for normal shutdown operation only and have no function during a design basis event except to remain closed. The MOVs are assured of not inadvertently changing position by being locked closed with power removed when RCS temperature is above 350°F. In addition, MOVs 700 and 721 are provided with a pressure interlock that prevents the valves from opening when RCS pressure is above 410 psig. Thus, in accordance with Supplement 1 to GL 89-10, response to questions 6 and 9, our review indicates that these MOVs have correctly been excluded from the program. Several additional MOVs have also been excluded from the program since the issuance of Inspection Report 92-80 using the guidance contained in Supplement 1 to GL 89-10.

RG&E is also considering the use of a "graded" approach for the continued implementation of the Ginna Station GL 89-10 Program consistent with NUMARC 93-05 and the Cooperative Efforts Group approach (Reference (d)). The use of PRA and other risk techniques to prioritize and optimize industry programs such as that required by GL 89-10 is strongly endorsed by RG&E and is consistent with our implementation of the Maintenance Rule. Consequently, the need to test the remaining non-risk significant MOVs and the commitment to periodically test safety-related MOVs every 5 years (Reference (b)) may be revised in the future. RG&E will inform the NRC of any changes in these areas consistent with the guidance contained in GL 89-10.

Very truly yours,


Robert C. Mecredy

10/10/10

MDF\581

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