PRIORITY 1

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9508090145 DOC.DATE: 95/07/31 NOTARIZED: NO DOCKET #
FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)
JOHNSON,A.R. Project Directorate I-1 (PD1-1) (Post 941001)

SUBJECT: Advises closure of util GL 89-10 MOV test program at plant.

DISTRIBUTION CODE: A064D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 4
TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveill

NOTES:License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD1-1 PD	1	1	JOHNSON,A	1	1
INTERNAL:	AEOD/SPD/RAB	1	1	FILE CENTER 01	1	1
	NRR/DE/EMEB	1	1	~~NRR/DLSP/PLPB~~	1	1
	NRR/DOPS/OECB	1	1	NRR/PD111-3	1	1
	RES/DSIR	1	1	RES/DSIR/EIB/B	1	1
EXTERNAL:	NOAC	1	1	NRC PDR	1	1

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM OWFN 5D8 (415-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 12 ENCL ~~12~~ 0

mAf

PRIORITY 1 DOCUMENT

ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001 AREA CODE 716 546-2700

ROBERT C. MECREDY
Vice President
Nuclear Operations

July 31, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Closure Submittal of NRC Generic Letter 89-10
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Ref.(a): Ginna Motor-Operated Valve Inspection 95-06, dated June 16, 1995

Dear Mr. Johnson:

The purpose of this submittal is to advise closure of the Rochester Gas & Electric (RG&E) Generic Letter (GL) 89-10 Motor-Operated Valve (MOV) Test Program at Ginna Station in accordance with GL 89-10, its supplements, and current closure guidance provided by the NRC. Program closure is based on the completion of design-basis capability verification of GL 89-10 MOVs installed at Ginna Station. RG&E has completed the recommended design and test activities to establish the design assurance for the performance of safety-related functions under worst-case design-basis conditions for applicable MOVs in their existing configuration.

While RG&E is providing closure notification of the GL 89-10 program, we intend to maintain this program for the continued verification of MOV operability.

The inspection report executive summary (Reference a) noted that administrative controls were lacking as related to inconsistencies and omissions in the GL 89-10 program documents. It was concluded that none of these deficiencies affected MOV functionality. We believe that our administrative controls for the implementation of the MOV program have been improved as demonstrated by but not limited to the following:

- Revision of the program implementation document, the MOV Qualification Program Plan, to address each of the applicable issues identified by Reference (a).
- Creation of a plant procedure for the specific purpose of ensuring that the post-test operability verification is performed prior to declaration of operability.

A064
1/0

- Revision of the design-basis calculation that establishes the basis for the GL 89-10 MOV scope to clarify the inclusion/ exclusion methodology for MOVs at Ginna Station.

RG&E has reviewed the Inspection Follow-up Items (IFIs) and Unresolved Item (URI) contained within Reference (a) and we substantially agree with the areas discussed and have made revisions to the appropriate program documents to address these items. Still, there are several issues for which we wish to clarify or reiterate our position regarding specific concerns identified as inspector follow-up items (IFIs) within Reference (a) as follows:

- RG&E agrees that the grouping methodology inadvertently employed for MOVs 850B and 4008 was not consistent with the recommendations provided by Supplement 6 to GL 89-10. RG&E intends to perform differential pressure testing of these two MOVs during the 1996 refueling outage. Since the test results for the sister MOVs indicate significant margin exists, no operability concerns have been identified. (IFI 95-06-08)

- RG&E believes that sufficient technical basis exists to allow the grouping of MOVs 4609, 4613, 4614 and 4780. These four butterfly valves possess sufficient equivalency in design and operating conditions to warrant the application of shared test data. RG&E has completed differential pressure testing of MOVs 4614 and 4609, although during the 1995 inspection the test summary spreadsheets were not fully updated, since the MOV 4609 test was performed in late 1994. (IFI 95-06-08)

- The 200 psid differential pressure value noted for the turbine-driven auxiliary feedwater pump MOVs 3504A and 3505A, which was based upon 1992 dynamic tests, is not considered to be the appropriate value for the GL 89-10 program, since the results of both differential pressure tests prove that sufficient thrust is available for the MOVs to close against the higher design-basis differential pressure as established by our Design Analysis. That pressure is determined from the required steam pressure that exists when the turbine-driven auxiliary feedwater pump delivers 400 gpm to the steam generators. (Section 2.1 of reference a.)

- RG&E continues to maintain that the differential pressure requirements in establishing test values under the GL 89-10 program be based on design-basis conditions. The program has been formulated to ensure MOVs are setup to meet design-basis requirements as opposed to other non-design-basis conditions that could exist, provided that sufficient margins have been demonstrated. Other conditions, such as those established in emergency operating procedures, normal, and abnormal operating conditions, were reviewed to demonstrate that sufficient margin does exist as compared to the design-basis values. We

do not view it to be a contradiction within our GL 89-10 program document, since the review of those other conditions supplemented, as opposed to being an integral part of, the 89-10 program. (IFI 95-06-01)

- RG&E has established the basis for periodic operability verification through the use of differential pressure testing. MOVs designated as high risk with low operability margin (< 10%) are subject to at least one additional differential pressure test. This approach will allow the evaluation of the effects of age-related degradation on those MOVs most susceptible. (IFI 95-06-06)

- Reference (a) stated that an exception to the guidelines existed as related to RG&E not performing a valve thrust verification test on MOVs following valve packing adjustment. Based on RG&Es experience with the Valve Packing Improvement Program and guidance provided by valve packing vendors, we continue to maintain that, as long as packing gland torque remains at or below the reference baseline torque value following packing adjustment, no significant increase in stem friction will result and no retest using diagnostic equipment is necessary. This position does not appear to be directly contrary to the GL 89-10 guidance and we are reluctant to add an additional layer of testing requirements absent a general industry-wide adoption of the retesting approach following routine packing adjustments performed by maintenance activities. (IFI 95-06-07)

- The inspection report (Section 2.8) states that the Design Analysis document NSL-5080-002 should be revised to include the pressure locking thermal binding (PLTB) considerations for MOVs RHR-850A/B and RCS-515/516 (PORV block valves). As noted in the inspection report, this issue with regard to the impact on design-basis differential pressure requirements for motor-operated gate valves, is currently unresolved pending issuance of generic guidance by the NRC. RG&E has completed two studies and believes reasonable assurance exists to preclude significant concern at this time. The operability of the susceptible gate valves has been appropriately addressed. Pending issuance of the NRC planned generic guidance, we believe it appropriate at this time to keep separate the PLTB studies evaluated under the Altran technical report and the GL 89-10 Design Analysis. (URI 95-06-09)

Very truly yours,

Robert C. Mecredy

NRC5\KAM\387

xc: Mr. Allen R. Johnson (Mail Stop 14B2)
Project Directorate I-1
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

US NRC Ginna Senior Resident Inspector