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SUBJECT: Revises 891222 response to Generic Ltr 89-10 re position
 changeable motor-operated valves.Util plans to endorse BWR
 Owners Group generic position on changeable valves
 contained in BWR Owners Group 910314 ltr.

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

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

December 20, 1991
G02-91-236

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
AMENDED RESPONSE TO GENERIC LETTER 89-10 CONCERNING
POSITION CHANGEABLE MOVES (TAC NOS. 75738 AND 77801)

- References:
- 1) Letter, G02-91-167, GC Sorensen (SS) to NRC, "NRC Inspection Report 91-16, Response to Notice of Violation, Response to Notice of Deviations", dated September 16, 1991
 - 2) Letter, G02-89-230, GC Sorensen (SS) to NRC, "Response to Generic Letter 89-10, Safety Related Motor Operated Valve Testing and Surveillance", dated December 22, 1989
 - 3) Letter, BWROG-91035, GJ Beck (BWROG) to TE Murley (NRC), "BWR Owners Group Design Basis Assumptions for BWR MOV Evaluations under Generic Letter 89-10", dated March 14, 1991
 - 4) Letter, TE Murley, Office of Nuclear Reactor Regulation, to George Beck, BWR Owners Group, "Consideration of Valve Mispositioning In Response to Generic Letter 89-10", dated April 29, 1991.

The Supply System committed in Reference 1 to revise our response to Generic Letter 89-10 by submitting a clarification pertaining to consideration of valve mispositioning. This letter constitutes our corrective action which was committed to be complete by January 1, 1992.

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Page Two

AMENDED RESPONSE TO GENERIC LETTER 89-10 CONCERNING
POSITION CHANGEABLE MOVES (TAC NOS. 75738 AND 77801)

Reference 2 provided our response to Generic Letter 89-10. This letter clarifies the Supply Systems position with respect to consideration of valve mispositioning. The Supply System plans to endorse the BWR Owners Group generic position on position changeable valves as contained in Reference 3. Reference 4 acknowledged receipt of the BWROG position by the NRC and stated that additional information was being developed on this issue. We will continue to monitor the progress and final NRR resolution of this generic issue. Any additional actions, if necessary, will be taken following NRC review of Reference 3.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

MRG/bk

cc: JB Martin - NRC RV
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