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SUBJECT: Informs that actions described in first paragraph of item i
of GL 89-10, were completed by 950628.

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

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July 28, 1995
GO2-95-143

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
GENERIC LETTER 89-10 AND SUPPLEMENTS**

- References:
1. Letter GO2-89-230, dated December 22, 1989, GC Sorensen (SS) to NRC, "Response to Generic Letter 89-10, 'Safety Related Motor-Operated Valve Testing and Surveillance,' dated June 28, 1995"
 2. Letter GO2-93-217, dated August 31, 1993, JV Parrish (SS) to NRC, "Generic Letter 89-10 and Supplements"
 3. Letter GI2-94-259, dated August 29, 1994, NRC to JV Parrish (SS), "Generic Letter 89-10 Schedule Clarification"
 4. Letter GO2-94-275, dated December 9, 1994, JV Parrish (SS) to NRC, "Generic Letter 89-10 and Supplements"

Pursuant to the requirements of 10 CFR 50.54f and as outlined in NRC Generic Letter (GL) 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance," item m, the Supply System hereby notifies the NRC that the actions described in the first paragraph of item i of the GL were completed by June 28, 1995 as committed in References 1 and 2.

In Reference 1, the Supply System informed the NRC that the recommendations contained in GL 89-10 would be completed within 5 years for those motor operated valves (MOV's) that can be tested in situ to the design basis pressure or flow conditions. Where such testing could not practicably be performed, the Supply System committed to implement the "two-stage" approach as outlined in the GL by (1) using analytical methods and extrapolations to design basis conditions based on the best data available, to be followed by (2) comparison with appropriate design basis test results on other MOV's. The letter stated that the comparison with test results on other MOV's would be performed as industry data became available and may not be completed within the 5 year period.

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GENERIC LETTER 89-10 AND SUPPLEMENTS

In Reference 2, the Supply System requested a one year extension to the original completion schedule that was to have completed implementation of the GL 89-10 recommendations during the Spring 1994 (R-9) maintenance and refueling outage. The additional time was necessary to perform retesting since much of the early MOV testing was found to be inadequate due to shortcomings identified with the MOVATS diagnostic system used at WNP-2. In Reference 3, the NRC approved the GL 89-10 implementation completion schedule extension until the end of the Spring 1995 (R-10) maintenance and refueling outage.

In Reference 4, the Supply System informed the NRC that certain MOVs in the Main Steam Isolation Valve Leakage Control (MSLC) system were being deferred for one year from GL 89-10 retesting because the system is scheduled to be functionally deleted during the Spring 1996 (R-11) maintenance and refueling outage. There was no safety significance associated with this decision since the affected MSLC system MOVs had all been previously tested and reviews of the test data and comparisons with new test data showed sufficient thrust margin to assure operability and functional reliability. This deferral does not impact the completion and closeout of the GL 89-10 implementation commitments since the affected MSLC system MOVs have been tested and the test data is acceptable.

Additional followup comparisons of WNP-2 data with industry data is ongoing and the Supply System believes that the continuation of this effort does not preclude the completion and closeout of the GL 89-10 implementation commitments. Only 17 out of 140 MOVs included in the MOV program require additional data comparison. All 17 of the affected MOVs have been statically tested in situ and 8 of the MOVs have been tested in the open direction under differential pressure conditions. As was stated in the Reference 1 letter, the data comparison would be performed as industry data became available and may not be completed within the GL 89-10 completion schedule. It is expected that the Electric Power Research Institute (EPRI) Performance Prediction Program comparison methodology will be used for the 17 MOVs requiring additional data comparison. The EPRI information was only recently (June 7, 1995) received by the Supply System for use. The necessary data from the valve vendors has been received for most of the 17 MOVs.

The recommendations of item j of GL 89-10 have been completed except for the establishment of a formal Periodic Verification program. This program is not one of the recommendations included in item i of the GL and is not subject to the completion schedule specified in References 1 and 2. Supply System staff are currently in the process of developing the new program.

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In conclusion, the Supply System believes that the recommendations of GL 89-10 have been satisfactorily implemented at WNP-2. Followup actions to complete the data comparison effort using the EPRI methodology and develop a Periodic Verification program are still in progress but do not preclude closure of the GL 89-10 implementation commitments. A NRC GL 89-10 preliminary closeout inspection (IR 95-24) was conducted during the week of July 17 - 21, 1995 to assess the status of implementation. No potential violations or deviations were identified by the inspection team.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. D.A. Swank at (509) 377-4563.

Sincerely,

A handwritten signature in dark ink, appearing to read "J.V. Parrish" followed by a stylized flourish or initials.

J.V. Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

CDM/
Attachments

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
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