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SUBJECT: Advises NRC that plant has completed actions re safety-
related MOV testing & surveillance for Unit 1 per GL 89-10.
Actions that remain to be addressed listed. I
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TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveill

NOTES: STANDARDIZED PLANT

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03410-WLS/SAB/RJR
July 2, 1995

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528
Completion of Generic Letter No. 89-10,
Safety-Related Motor Operated Valve Testing and
Surveillance**

Generic Letter (GL) 89-10 requires licensees to advise the NRC in writing when the actions delineated in the first paragraph of item (i) of the GL have been completed. Arizona Public Service Company (APS) has completed these actions for Unit 1 at PVNGS. The motor-operated valves (MOV) within the scope of the program for Unit 1 have been evaluated and tested and are considered operable under all design basis conditions and normal events.

Although development and implementation of the MOV program have been completed, actions remain to be taken to address additional MOV issues. These actions include:

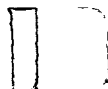
1) Pressure Locking/Thermal Binding

The evaluation of the potential for pressure locking and thermal binding of safety-related gate valves is ongoing. A proposed GL on this issue was published for comment in the Federal Register on March 27, 1995. A review of this proposed GL is in progress.

2) Periodic Verification

Although periodic verification requirements have been incorporated in the MOV program, an evaluation of the need to perform periodic dynamic testing is ongoing. This evaluation will include a review of the MOV test program completed by the Electric Power Research Institute (EPRI) and the test data from the three PVNGS Units.

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3) Valve Mispositioning

The PVNGS MOV program currently incorporates elements of valve mispositioning. It is understood that Supplement 7 of GL 89-10 will address valve mispositioning and will be issued in the near future.

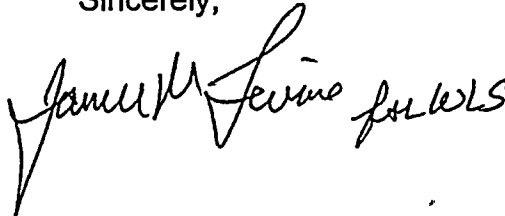
4. Thermal Expansion

The thermal expansion of water between two closed valves is still being evaluated. Although this issue is considered in the design bases of the plant, operation of these valves following a design basis event is not. PVNGS procedures use these valves post accident (normal MOV operations), and the resolution of this issue requires further analysis.

The NRC conducted inspections of the MOV program on July 8-26, 1991, (50-528/529/530/91-25), October 18-22, 1993, (50-528/529/530/93-32), and April 4-8, and 20, 1994, (50-528/529/530/94-11). In the April 1994 inspection, the NRC inspectors concluded that the APS MOV program was generally capable of demonstrating the operability of MOVs subject to GL 89-10 and that the program was thorough and was being implemented in a manner consistent with the APS commitments to the GL.

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,

A handwritten signature in cursive script, reading "James M. Levine for WLS". The signature is written in dark ink and is positioned below the word "Sincerely,".

WLS/SAB/RJR/rv

cc: K. E. Perkins
L. J. Callan
B. E. Holian
K. E. Johnston

