

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Informs that PVNGS plans to continue participating in Joint Owner' Group MOV-periodic verification program, in response to GL 96-05. Licensee plans to implement program elements described in TR NEDC-32719, Rev 2, as amended by SE.

NOTES:STANDARDIZED PLANT	05000528
Standardized plant.	05000529
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July 19, 1998

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- Reference:
- (a) Safety Evaluation on Joint Owners' Group Program on Periodic Verification of Motor-Operated Valves Described in Topical Report NEDC-32719 (Revision 2), dated October 30, 1997
  - (b) Generic Letter 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves", dated September 18, 1996

**Subject:** Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528/529/530  
Response to Safety Evaluation for Joint Owners' Group  
Program on Periodic Verification of Motor-Operated Valves (in  
response to Generic Letter 96-05)

Dear Sirs:

On October 30, 1997, the Nuclear Regulatory Commission (NRC) issued reference (a) which, within the conditions and limitations described in the Safety Evaluation (SE), stated that the NRC considers the Joint Owners' Group (JOG) Program on MOV Periodic Verification an acceptable industry-wide response to Generic Letter (GL) 96-05.

The JOG had agreed that after issuance of the SE, requests would be made for participating utilities to notify the NRC of their plans to implement the JOG program and justify any deviations from the JOG program.

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U S Nuclear Regulatory Commission  
Response to Safety Evaluation-Joint Owners' Group Program on Periodic  
Verification of Motor-Operated Valves (in response to Generic Letter 96-05)  
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PVNGS plans to continue participating in the JOG MOV-Periodic Verification Program as a member of the CEOG and plans to implement the program elements described in Topical Report NEDC-32719, Revision 2 as amended by the SE with the following exception:

Table 4-1 of the Topical Report shows the risk and margin categories for static diagnostic testing frequency during the interim periodic test program. The PVNGS interim test program does not meet the frequencies specified in Table 4-1. PVNGS does not currently use any risk ranking criteria in the establishment of static test frequency.

PVNGS utilizes a train-related outage scheduling system in which the majority of A-train maintenance and testing is performed during an A-train outage, and B-train maintenance and testing is performed during a B-train outage. As such, static diagnostic testing is normally performed on a 2 cycle frequency. Some static testing has been extended for a 3rd cycle to align the testing with the train-related outage philosophy. This philosophy meets the testing guidelines specified in GL 89-10.

In cases where the as-found testing reveals that the actuator did not supply the required thrust/torque, the situation is evaluated in accordance with the station Condition Report/Disposition Report (CRDR) process. The impact of the as-found condition is evaluated on a case-by-case basis to ensure that the actuator has sufficient margin to remain operable until the next scheduled test regardless of the risk categorization of the valve/actuator. The as-left settings may be increased to ensure the available margin, or the test frequency could be shortened. The performance history of MOV's at Palo Verde has been such that no valve/actuators have required static testing to be increased to every refueling outage. Based on the performance history and compliance with the original GL 89-10 requirements, PVNGS believes this exception to be justified.

In the future, the static diagnostic test frequency may be extended past the current 2 cycle test frequency, however, this determination will be based on the past performance of the valve/actuator and the available margin. The risk categorization of the valve/actuator, when completed, may be considered as additional support for extending the test frequency, but will not be the primary factor.

Apart from the JOG effort, PVNGS uses the existing static diagnostic testing program and the MOV performance trending program to monitor the thrust and torque delivered by the actuator. Other test methodologies such as motor power



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monitoring and use of a torque test stand are being investigated as possible enhancements to the existing program.

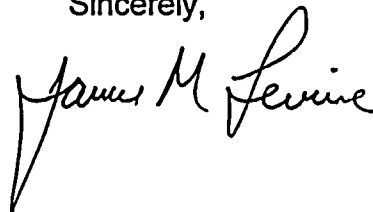
The existing program of preventive maintenance, static diagnostic testing, MOV performance trending, and participation in the JOG test program meets the requirements of GL 96-05.

Commitments Made in this Letter

PVNGS plans to continue participating in the JOG MOV-Periodic Verification Program as a member of the CEOG and plans to implement the program elements described in Topical Report NEDC-32719, Revision 2 as amended by the SE with the above noted exception.

Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions or would like additional information regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James M. Levine". The signature is fluid and cursive, with a large initial "J" and "L".

JML/SAB/MLG/rjh

cc:

E. W. Merschoff  
K. E. Perkins  
M. B. Fields  
J. H. Moorman