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SUBJECT: Discusses safety-related MOV testing & surveillance,per Generic Ltr 89-10.

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

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L-94-59
10 CFR 50.4

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Safety-Related Motor-Operated Valve
Testing and Surveillance - Generic Letter 89-10

On June 28, 1989, the NRC issued Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," recommending that licensees establish a program to provide for the testing, inspection, and maintenance of safety-related motor-operated valves (MOVs). Florida Power and Light's (FPL) current acceptance of the recommendations and schedular requirements of the generic letter is documented in FPL letters L-89-467, dated December 28, 1989 and L-90-233, dated June 28, 1990.

Item c. of GL 89-10 recommends that all safety-related MOVs be tested in situ under the most limiting design basis condition in order to demonstrate MOV operability. However, GL 89-10 also allows licensees to propose alternatives to the recommendations of the generic letter where technical justification is provided. Consistent with this position and in accordance with the guidance presented in Supplement 6 to GL 89-10, FPL intends to reduce the dynamic testing scope of GL 89-10 by the grouping of testable MOVs at Turkey Point Units 3 and 4. The technical basis for the grouping of program MOVs is based on the conservative application of plant-specific MOV test results of similar valves. The MOV grouping methodology is also consistent with the recommendations of Nuclear Management and Resources Council (NUMARC) 93-04, "Guidelines for Optimizing Safety Benefits in Assuring the Performance of Motor-Operated Valves". Prioritization has been given to dynamically test those program MOVs that have been shown by plant specific probabilistic and deterministic methods to be of the greatest safety significance and least design margin. The grouping methodology has been primarily utilized for those MOVs that have high design margins and low safety significance.

The technical evaluation detailing the grouping methodology is available as part of the Turkey Point GL 89-10 MOV program documentation. The total MOV dynamic testing scope reduction consists of 11 out of 53 MOVs for Turkey Point Unit 3, 14 out of 53 MOVs for Turkey Point Unit 4, and 3 out of 5 shared MOVs. Any future changes in MOV dynamic testing scope will be documented within the subject technical evaluation. Static testing of all GL 89-10 program MOVs will still be performed consistent with the recommendations of GL 89-10.

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FPL will complete MOV testing and operability assessments for Turkey Point Units 3 and 4 at the conclusion of the next refueling outage for each unit. The next refueling outage for Unit 3 is currently scheduled to start in April 1994. The next refueling outage for Unit 4 is currently scheduled to start in October 1994. Complete documentation of the engineering calculations and evaluations will be finalized 60 days after the conclusion of the refueling outage for each unit. Within 30 days of completion of the final documentation, in accordance with GL 89-10 recommendations, FPL will provide written notification to the NRC of Turkey Point Units 3 and 4's completion of GL 89-10 recommended actions.

Should there be any questions, please contact us.

Very truly yours,

J. H. Goldberg
President
Nuclear Division

JHG/OIH

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant