

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

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Vice President Engineering

May 13, 1994

ET 94-0030

U. S. Nuclear Regulatory Commission  
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References: 1) Letter WM 92-0204, dated December 29, 1992 to NRC  
from B. D. Withers, WCNOC  
2) Letter WM 93-0032, dated February 25, 1993 to NRC  
from B. D. Withers, WCNOC  
3) Letter dated November 12, 1993 to WCNOC from NRC  
Subject: Docket No. 50-482: Change to a Commitment Associated  
to Generic Letter 89-10, "Safety-Related Motor-Operated  
Valve Testing and Surveillance"

Gentlemen:

This letter provides documentation of a change to a commitment that was made in references 1 and 2. Wolf Creek Nuclear Operating Corporation (WCNOC) committed to refurbish or replace all motor operated valve (MOV) actuators. This letter also provides a change in program philosophy concerning differential pressure testing.

In the commitment documented in references 1 and 2, WCNOC stated:

"Additionally, WCNOC intends to refurbish/replace actuators on all valves in the WCNOC MOV Program prior to the completion of NRC Generic Letter 89-10."

" . . . 2) will inspect or replace all stem nuts during refurbishment/replacement of actuators on all valves in the WCNOC MOV program prior to the completion of NRC Generic Letter 89-10."

However, since that time, the schedule for refurbishment or replacements has been revised to continue beyond the committed WCNOC completion date of December 31, 1994, for Stage 1 of Generic Letter 89-10. This is based upon a recent change in methodology with respect to the remaining MOVs to be evaluated under the WCNOC MOV program. This change in methodology involves the use of conservative high margins. High margins are established when definite conservative minimum thrust/torque requirements can be determined and relatively large thrust/torque windows can be established. This approach does

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