



GULF STATES UTILITIES COMPANY

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June 28, 1990
RBG-33132
File Nos. G9.5, G9.33.4

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

River Bend Station - Unit 1
Docket No. 50-458

In Generic Letter (GL) 89-10, "Safety Related Motor-Operated Valve (MOV) Testing and Surveillance", the NRC requested that licensees advise the NRC in writing that the schedules and recommendations outlined in the generic letter will be met or to provide technical justification for any date, schedule or recommendation that will not be met. GSU submitted its initial response to this GL on December 20, 1989 (RBG-31977); this letter supersedes that response.

GSU is developing a program in response to GL 89-10 to improve the reliability of safety-related MOVs. Initially the program will include 260 safety-related MOVs. The program will include review and documentation of maximum expected differential pressures and degraded voltage considerations.

The issue of mispositioning of MOVs is an unresolved subject between the industry and NRC. The effects of single active failures (such as operator mispositioning of a valve) have been considered in the BWR design basis and are addressed in the RBS USAR and are therefore not considered necessary for inclusion into the scope of this program. GSU agrees with NUMARC and the BWROG executives that this issue of mispositioning is not essential for completion of this activity.

GSU will document technical justification for exclusion of any safety-related MOVs from the program. A program and methodology for selecting and maintaining proper switch settings will be established. In situ testing at full flow and maximum differential pressure will be performed where possible to verify these switch settings. In cases where in situ full flow and differential pressure testing cannot be accomplished, testing will be performed at less than full flow and differential pressure conditions (Phase I). Analytical methods using the best available information and extrapolation to design basis conditions will then be used to verify the switch settings until such time as test data or validated analytical methods

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become available (Phase II). This program is a major effort which GSU will have to commit greater than 160,000 manhours to complete the initial phase of analysis and testing. Therefore, it is GSU's intention to give priority for full flow testing of MOV's based on their safety significance, design margin, and differential pressure/flow conditions under which they are required to function. The design basis reviews will establish this priority. As a minimum, GSU will test all valves included in the program under static conditions to establish a baseline for evaluation of switch settings and MOV performance during periodic surveillance and post-maintenance testing.

GSU is aware of the questions raised concerning the validity of standard industry MOV sizing calculations. We will consider the impact of the most current test data available in developing our program. GSU is also aware of the uncertainties concerning the limitations of currently available test equipment and what constitutes an acceptable test and will be following future developments in these areas. GSU is a member of EPRI and is actively participating in the Boiling Water Reactor Owner's Group (BWROG) and Motor Operator Valve Users Group (MUG) activities related to MOV testing issues. GSU remains committed to the ASME Section XI In-Service Testing program required by 10CFR50.55(a) for determination of the operational readiness of safety-related MOVs. GSU also plans to participate in the NUMARC/EPRI sponsored MOV performance prediction program. As new developments and information become available, GSU will review and revise our program as necessary to incorporate the latest industry trends in this area.

The generic letter recommends that the Licensee complete all initial design basis reviews, analyses, verifications, tests and inspections within 5 years or 3 refueling outages, whichever is later. It is understood that this recommended schedule was based on an industry average of 150 safety-related MOVs per plant, which is equivalent to completing an average of 50 valves per refueling outage or 30 valves per year. GSU understands the need to complete this initial program as soon as possible and plans to perform design basis reviews and testing on parallel paths. GSU also plans to test as many valves as practical during the plant operating cycles and where possible during forced outages. However, most of the 260 safety-related MOVs will require a plant outage for testing and due to the large number of safety related MOVs, it is estimated that completion of Phase I of the testing program will require 4 refueling outages. A schedule for completion of Phase II of the testing program will be provided upon completion of the EPRI MOV Program. GSU plans to complete the design reviews for all 260 safety-related MOV's within the recommended 5 years (by June 28, 1994). GSU will submit in writing any future changes to scheduled commitments and will notify the NRC in writing within 30 days of completion of the actions described in the first paragraph of item i of the generic letter.

June 28, 1990
Page 3 of 3

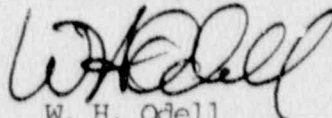
GL 89-10 recommends that the program description and schedule for the recommended actions be available within one year or one refueling outage, whichever is later. GSU will have the program description and schedule available by November 30, 1990 (one refueling outage). GSU will also initiate a tracking and trending program to monitor MOV performance and compile a complete history for each MOV included in the program.

The generic letter recommends that MOV data be periodically examined for trending purposes every 2 years or after every refueling outage. GSU will review trended data after every refueling outage after initial program implementation.

GL 89-10 also recommends that established switch settings be verified periodically with a surveillance interval not to exceed 5 years or 3 refueling outages. GSU will re-verify switch settings on an initial surveillance interval of 5 years.

If you have any questions, please contact Mr. L. L. Dietrich of my staff at (504) 381-4866.

Sincerely,



W. H. Odell

Manager-Oversight

River Bend Nuclear Group



TFP/LAE/LLD/WOS/pg

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STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of)
GULF STATES UTILITIES COMPANY)

(River Bend Station - Unit 1)

W. H. Odell, being duly sworn, states that he is a Manager - Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 28th day of June, 1990. My Commission expires with Life.

Claudia F. Hurst
Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana