Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

July 28, 1994

Generic Letter 89-10

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Response to NRC Generic Letter 89-10,
"Safety-related Motor-operated Valve Testing and Surveillance"

Our response to Generic Letter 89-10 follows:

Reporting Requirement (Item m. of the June 28, 1989 Generic Letter):

Each licensee shall notify the NRC in writing within 30 days after the actions described in the first paragraph of item 1. have been completed.

Response:

On June 28, 1994 during the Prairie Island Unit 1 refueling outage, we completed the initial testing and setup of the valves included in the Generic Letter 89-10 motor-operated valve (MOV) program.

All design changes to MOVs, initiated from Generic Letter 89-10 MOV program reviews and analyses, have been completed in both units (constituting approximately one-fourth of all valves in the program) with the exception of motor brake removal on several Unit 2 valves. These will be removed during the Spring 1995 Unit 2 refueling outage as we committed in our response, of February 4, 1994, to the Region III MOV inspection report, of December 2, 1993.

In our original response (dated December 28, 1989) to Generic Letter 89-10, we stated that "Differential pressure testing will be performed to the extent practicable." There are two groups of valves which we consider to not be included in this category. The first group contains those valves which cannot be dynamically tested at full design basis conditions due to plant design. These valves have been set up statically using the best available Prairie

gl8910_end
010127

A064
1/0

Island or industry data. These valves are planned to be evaluated using the EPRI MOV Performance Prediction Program methodology as it becomes available.

The second group includes those valves for which no meaningful data can be obtained by performing differential pressure testing, thus making the testing not practicable (performing the testing would involve increasing the costs and risks associated with testing with no compensating knowledge of the conditions of the valves). These are valves which have low design basis differential pressures relative to other valves (e.g., small dynamic component of total seating/unseating force). In cases where a dynamic test would not provide useful data to aid in the setting of the valve, we have chosen to shift resources to other, significant, testing. Such valves also have been set up statically using the best available Prairie Island or industry data. Region III inspectors evaluating our MOV testing program considered this treatment of the second group of valves to represent a change of previous commitment which requires written communication with NRR per the requirements of Generic Letter 89-10. This discussion is therefore intended to clarify our previous commitment.

In this letter we are making no new NRC commitments but are clarifying an earlier commitment: "Differential pressure testing will be performed to the extent practicable" refers to the exclusion of differential pressure testing of both those valves which are not testable due to plant design and those valves for which differential testing will provide no meaningful information.

Please contact Jack Leveille (612-388-1121, Ext 4662) if you have any questions related to our response.

Jack Leveille for

Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg

g18910.end