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W3F1-94-0135

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August 5, 1994

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Closeout of Generic Letter 89-10

Gentlemen:

This letter is provided as a followup to the conference call held July 29, 1994, between members of your staff and Waterford 3 personnel. We appreciate the opportunity to exchange information regarding the closeout of Generic Letter 89-10.

From the information made available, we understand that the NRC is currently deciding on the nature of the closeout of Generic Letter 89-10 for Waterford 3. We believe that a conference call together with other documentation, discussed below, is the most efficient and effective vehicle for closure of Waterford 3 design basis capability of GL 89-10 MOVs. The basis for this position is documented in this submittal for consideration by the NRC.

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Waterford 3 has formally notified the NRC via letter W3F1-94-0125 dated July 28, 1994, of the completion of the actions described in GL 89-10 as required by item m of the Generic Letter. The Waterford 3 MOV program has been both proactive and comprehensive. The phase one inspection was conducted January 27 - 31, 1992, and the NRC concluded in Inspection Report No. 50-382/92-02 that the development of the program was considered to be a strength generally consistent with commitments to GL 89-10. The phase two inspection was conducted April 12 - 16, 1993, and the NRC concluded in Inspection Report No. 50-382/93-06 that the implementation of the MOV program was considered to be generally in accordance with commitments to GL 89-10. There were no violations resulting from either of these inspections. All of the inspection open items have been addressed except for the issues of (1) pressure locking and thermal binding, and (2) periodic verification which are NRC ongoing issues and are herein addressed. The Waterford 3 program has been proactive in addressing industry issues, for example, diagnostic equipment inaccuracies, elevated temperature effects on Reliance AC Motors, and Load Sensitive Behavior. Waterford 3 has taken an active role in keeping abreast of technical issues and is a participant in the Motor-Operated Valve Users Group (MUG), the Electric Power Research Institute (EPRI) MOV Performance Prediction Program, the Kalsi Engineering Limitorque Actuator Overload Project, and Entergy MOV Peer Group.

The Waterford 3 MOV program has generally adopted the NRC and industry guidance. Waterford 3 has a small number of MOVs in the program, and differential pressure testing has been performed where practicable. Static baseline testing of all fifty-six (56) GL 89-10 MOVs has been completed. Forty (40) MOVs were tested at 75% or greater of the design basis differential pressure. The majority of MOVs have been tested by both the MOVATS and VOTES systems. In addition to the GL 89-10 testing performed, testing of Category 2 MOVs began during Refuel 6. All DBR calculations for the fifty-six (56) MOVs within the GL 89-10 program have been completed, including the determination of the design basis degraded voltage and the incorporation of test results into the Design basis scenarios where appropriate. In addition, DBR calculations have been prepared for sixty-three (63) of the sixty-seven (67) Category 2 MOVs.

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The documentation of the Waterford 3 program has been extensive and comprehensive. The NRC, we believe, will be able to readily correlate the implementation of the MOV program with the specific elements of GL 89-10 and its supplements. One example of the extensive and comprehensive documentation of the Waterford 3 MOV program is the Waterford 3 GL 89-10 MOV Closeout Report.

The specific items that we understand require resolution are (1) valve mispositioning, (2) pressure locking and thermal binding, and (3) periodic verification. Waterford 3 currently does consider valve mispositioning. We believe we have made progress in addressing pressure locking and thermal binding, and we are prepared to discuss our progress on this issue with the staff. Although we have not finalized a periodic verification program, we are currently working toward that end, and we plan to discuss a periodic verification program acceptable to the NRC for the closure of the design basis capability verification of GL 89-10 MOVs.

We believe that the appropriate vehicle to close out GL 89-10 is a conference call in lieu of a closeout inspection. This would be followed by a closeout report prepared by Waterford 3 which would address each item in Enclosure 2 of the July 12, 1994 NRC Memorandum. This week our MOV staff is participating in an industry MOV Users Group meeting. We believe we can be prepared to hold the above mentioned discussions and complete the closeout report with its objective evidence by September 15, 1994. If the NRC decides that this action is inappropriate or insufficient, then your consideration of a reduced scope inspection may be warranted.

We would like to thank the NRC for the opportunity to comment on this matter and would appreciate a response after your review of this submittal.

.Closeout of Generic Letter 89-10

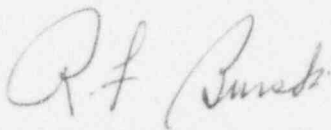
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Please contact me or R.J. Murillo (504) 739-6715 should there be any questions regarding this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R.F. Burski".

R.F. Burski
Director
Nuclear Safety

RFB/RJM/tmm

cc: L.J. Callan, NRC Region IV
T.F. Westerman
B.W. Sheron
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office