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U.S. NUCLEAR REGULATORY COMMISSION
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Gentlemen:

DOCKET NUMBERS 50-266 AND 50-301
CLARIFICATION OF GENERIC LETTER 89-10 PROGRAM
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

NRC Generic Letter No. 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," dated June 28, 1989, requested that all licensees establish a program for the testing, inspection, and maintenance of safety-related motor-operated valves (MOVs) and position-changeable valves in safety-related systems. The specific generic letter requirements are broken into two phases. Phase I covers the documentation of the specific program description and a schedule for implementing the program. Phase II covers the actual program implementation and is required to be completed by June 1994.

In our response dated December 15, 1989 (VPNPD 89-661), Wisconsin Electric made a commitment to meet the five-year schedule for implementing the MOV testing and surveillance program. The content of the proposed MOV program was consistent with the recommendations of the generic letter with one exception. In the response to Generic Letter 89-10, Wisconsin Electric proposed an alternative to Item c. Item c requested that licensees perform tests of MOVs in situ under design-basis conditions where practicable. In cases where such testing was not practicable, the generic letter indicated that licensees should develop alternatives to demonstrate that the MOV would operate under design-basis conditions.

As an alternative, Wisconsin Electric proposed the categorization of MOVs into families based on type, size, and manufacturer. One MOV from each family would be tested under design-basis conditions with the test results applied to other MOVs in that family. The NRC responded on January 11, 1991, expressing concerns regarding this approach and stating that the applicability of test data from one MOV to another would need to be justified.

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Subsequently, on March 8, 1994, the NRC issued Supplement 6 to Generic Letter 89-10. In this supplement, the NRC stated that grouping data obtained during design-basis differential pressure testing of similar MOVs at or near design-basis test conditions may be an acceptable option to establish design-basis valve setup conditions. Should a licensee choose to group MOVs, the NRC believes that seven criteria should be considered.

This letter is being submitted to inform you that Wisconsin Electric intends to meet the criteria for grouping MOVs contained in Supplement 6 to Generic Letter 89-10 with the exception of Item 4. Item 4 states that, to the extent practicable, selection of valves for dynamic testing in a group should be based on a prioritization scheme that considers the greatest safety-significance and the least performance margin.

Wisconsin Electric was not able to strictly consider safety-significance during the MOV selection process because our probabilistic safety assessment had not been completed at that time. Instead, the selection of valves for dynamic testing within a group was based on the following criteria:

- The valves subjected to the highest differential pressure within a group were tested.
- A minimum of two valves or 35% of the valves within each group, whichever was greater, were tested.
- Any valves within a group that exhibited small performance margins were tested.

We believe this approach is an acceptable selection alternative since it assures that the most severe operating conditions and the most limiting cases (small performance margins) within each group are enveloped by the testing performed. Additionally, the capability of each valve's operator was not considered in the selection process because it has no bearing on the thrust requirements for each valve. Please contact us if there are any questions concerning this information.

Sincerely,



Gary M. Krieser
Manager
Industry and Regulatory Services

cc: NRC Resident Inspector
NRC Regional Administrator