



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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Robert A. Stratman
VICE PRESIDENT - NUCLEAR

October 14, 1994
PY-CEI/NRR-1864 L

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

Perry Nuclear Power Plant
Docket No. 50-440
Amended Response to Generic Letter 89-10,
Supplement 5, "Inaccuracy of Motor-
Operated Valve Diagnostic Equipment"

- References: 1. September 30, 1993 letter from R. A. Stratman to Nuclear Regulatory Commission, Response to Generic Letter 89-10, Supplement 5, "Inaccuracy of Motor-Operated Valve Diagnostic Equipment" (PY-CEI/NRR-1707 L)
2. September 23, 1994 letter from R. A. Stratman to Nuclear Regulatory Commission, Amended Response to Generic Letter 89-10, Supplement 6, "Information on Schedule and Grouping, and Staff Responses to Additional Public Questions" (PY-CEI/NRR-1849 L)

Gentlemen:

On September 30, 1993, the Perry Nuclear Power Plant (PNPP) responded to Generic Letter (GL) 89-10, Supplement 5 concerning inaccuracies associated with motor-operated valve (MOV) diagnostic equipment (Reference 1). The following amends that response to include information obtained as a result of program development and testing activities.

The initial re-evaluation of the GL 89-10 Supplement 5-related test results concluded that the affected MOVs remained capable of performing their intended functions. The evaluations performed did indicate, however, that for nineteen (19) of the MOVs included in the scope of this review, additional testing would be required to confirm the effects of the maximum possible diagnostic equipment inaccuracies with regard to measured valve performance. These 19 MOVs were to be retested with the MOVATS 3500 system or other direct thrust measuring device prior to start up from Refueling Outage (RFO) 4 (the scheduled completion date for the testing required under the GL 89-10 program). Evaluations demonstrating continued operability were performed for those MOVs requiring the above referenced confirmatory testing. These 19 MOVs were satisfactorily retested/dispositioned, as scheduled (see Reference 2).

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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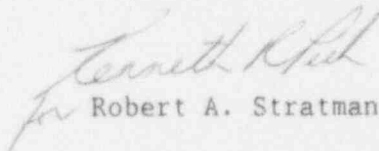
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Newly acquired industry and test information is incorporated into the GL 89-10 program on an ongoing basis. Subsequent to the initial GL 89-10 Supplement 5 evaluation (Reference 1), additional conservatisms, which included higher valve factors, rate of loading, stem lubrication degradation and/or increased required thrust, were added to the program. These factors are not related to MOV diagnostic equipment inaccuracies, but do affect the results of prior analyses. All MOVs previously tested with open versus close methodology were re-evaluated. The re-evaluation concluded that thirteen (13) MOVs had results which fell outside of the new conservative torque thrust window. These results were obtained because the additional conservatisms increased the potential negative effects of MOV diagnostic equipment inaccuracies on the previous test results.

Evaluations demonstrating continued operability were performed. These 13 MOVs are scheduled for diagnostic testing by the end of RF05 to ensure the torque switch settings are in accordance with the latest torque thrust windows. RF05 is currently scheduled to begin in January, 1996.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager-Regulatory Affairs, at (216) 280-5833.

Very truly yours,


for Robert A. Stratman


Enclosure

RAS:CRE:SC

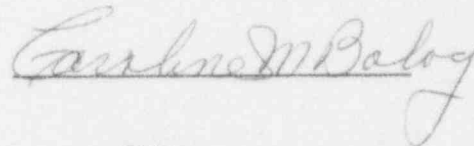
cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III Administrator

PY-CEI/NRR-1864 L
Enclosure

I, Kenneth R. Pech, being duly sworn state that (1) I am Director, Perry Nuclear Assurance Department of the Cleveland Electric Illuminating Company, and (2) I am duly authorized to execute and file this certification and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.


Kenneth R. Pech

Sworn and subscribed before me, this 14th day of October, 1994


CAROLINE M. BALOG
Notary Public, State of Ohio
My Commission expires April 20, 1995
(Recorded in Lake County)