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**DUKE POWER**

January 23, 1995

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

Subject: Catawba Nuclear Station, Units 1 and 2  
Dockets Nos. 50-413 and 50-414  
Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance", Group 1 Valve Closure

Pursuant to the requirements of Generic Letter (GL) 89-10, item "m" and D.L. Rehn's letter to your staff, dated December 13, 1994, Duke Power Company (DPC) requests closure of Catawba's GL 89-10, Group 1 and low margin Group 2 valves for both Stage 1 and Stage 2 verifications. This request for closure does not include the remaining GL 89-10 Group 2 valves.

Total valves, for which closure is requested at Catawba, consists of 290 Group 1 and 6 Group 2 valves originally identified as low margin for a total of 296 valves. The Motor Operator Valve (MOV) design basis capability verification portion of the GL 89-10 program for these valves was completed December 28, 1994, as committed by DPC letter dated October 31, 1991.

Stage 1 (calculations and static testing) for these valves are complete, as well as the Stage 2 verifications. The distribution of methods used to complete the Stage 2 verifications are outlined in the Attachment.

For valves that have not been differential-pressure (DP) tested, further justification in the areas of rate of loading and friction coefficients are continuing to be reviewed with information, test techniques, and tools developed from the EPRI MOV Prediction Program.

We agreed, by DPC letter dated October 27, 1994, to accelerate the schedule and commit to completing all remaining Group 2 valves (currently 178 valves for both units) for Unit 1 by the end of refueling outage 1EOC9 (currently scheduled to end October 23, 1996) and for Unit 2 by the end of refueling outage 2EOC8 (currently scheduled to end May 5, 1997).

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U. S. Regulatory Commission  
January 23, 1995  
Page 3

If there are any further questions, please contact Jeff Lowery at (803) 831-3414.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'DL Rehn', written over a horizontal line.

D. L. Rehn, Site Vice-President  
Catawba Nuclear Station

Attachment

xc: S. D. Ebnetter,  
Regional Administrator, Region II

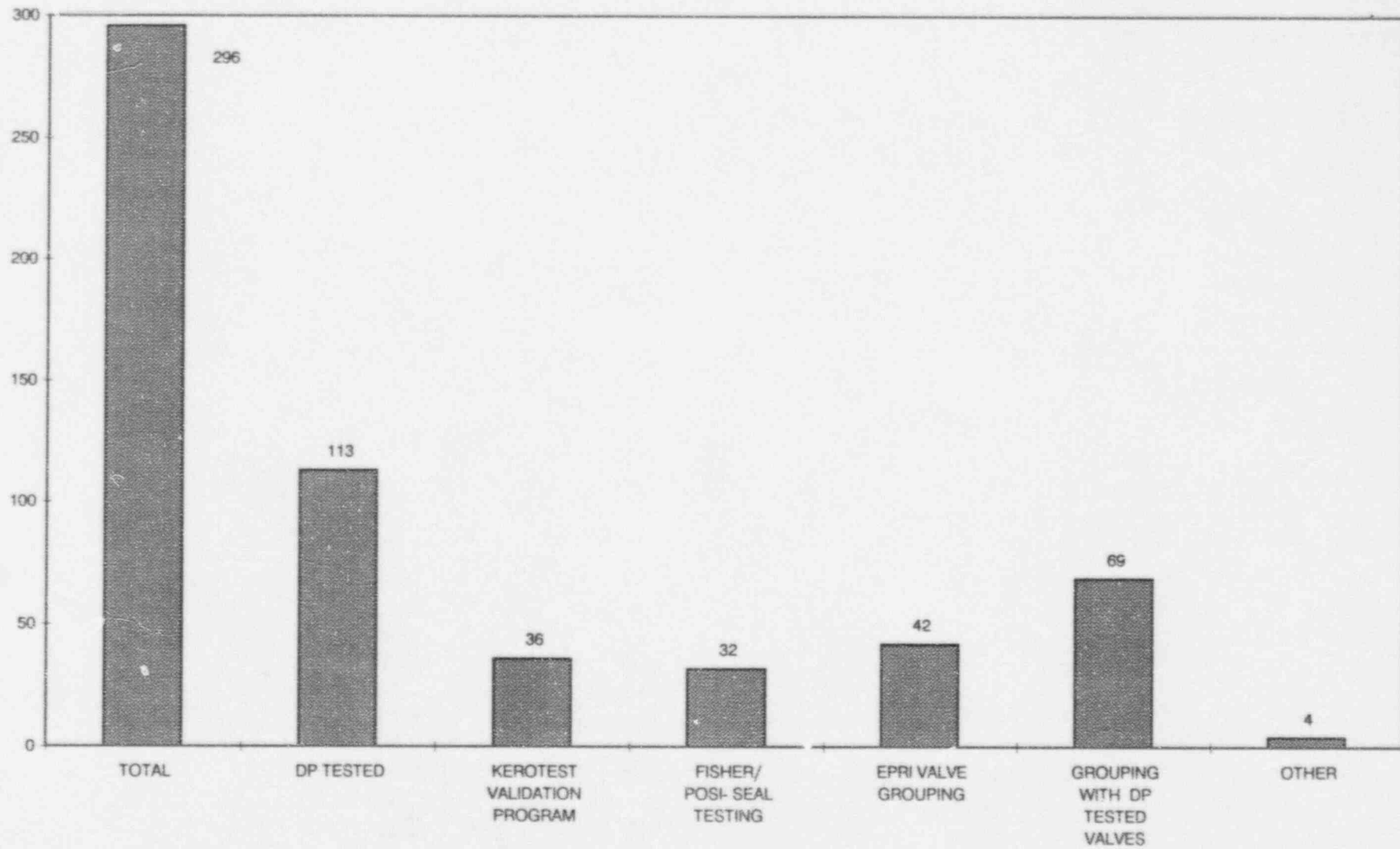
R. E. Martin, ONRR

R. J. Freudenberger,  
Senior Resident Inspector

C. A. Casto,  
Engineering Branch, Region II

ATTACHMENT

### GROUP 1 STAGE 2 VERIFICATION



**GROUP 1 STAGE 2 VERIFICATION METHODS**

- |                                       |   |   |
|---------------------------------------|---|---|
| <b>DP Tested</b>                      | - | Consists of MOVs that were DP tested at 80% or greater design basis conditions, where a static test demonstrates design basis conditions, and for some butterfly valves where a partial design basis DP and flow test and grouping was used.  |
| <b>Kerotest Validation Program</b>    | - | Consists of Kerotest valves verified by grouping by the Duke Kerotest Validation Program.   |
| <b>Fisher/Posi-Seal Testing</b>       | - | Consists of the group of Fisher/Posi-Seal valves verified by testing conducted by Duke Power and Kalsi Engineering.   |
| <b>EPRI Valve Grouping</b>            | - | Consists of valves whose calculation has valve factors that bound the flow loop and in-situ test results used to validate the EPRI MOV Performance Prediction Program.  |
| <b>Grouping with DP Tested Valves</b> | - | Consists of valves grouped with valves DP tested of similar design.   |
| <b>Other</b>                          | - | Consists of four Westinghouse 18 inch, 300 LB Class gate valves. Valves cannot be DP test in-situ and no similar valve DP test information is available. The valves are containment sump isolation valves. The safety function is to open with 20 psid. Review of the available Westinghouse information from Duke and EPRI testing indicate conservative margin is available to open the valves. |