



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

DS09
April 26, 1995
GO2-95-080

Chief
Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

(13)
11008
60FR15799
03/27/95
A. Kugler T. Scarbrough

Dear Sir:

Subject: **COMMENTS ON PROPOSED GENERIC LETTER; PRESSURE LOCKING
AND THERMAL BINDING OF SAFETY-RELATED POWER-OPERATED
GATE VALVES (60 FR 15799)**

The proposed Generic Letter is intended to ensure that licensees have performed or will perform evaluations, analyses and/or corrective actions to ensure that safety-related power-operated gate valves that may be susceptible to pressure locking or thermal binding are capable of performing their safety functions. The Nuclear Regulatory Commission has solicited comments regarding both the technical and regulatory aspects of the proposed Generic Letter.

The Supply System has reviewed the proposed Generic Letter and respectfully submits the following comments:

The proposed Generic Letter section "Requested Actions:"

- Item 1, would require the addressee of the Generic Letter to perform and complete an evaluation of the operational configurations of all safety-related power-operated gate valves within 60 days of the Generic Letter. The Supply System recommends that this completion period be extended from 60 days to 120 days.
- Item 2, would require the addressee to implement and complete the guidance provided to complete an evaluation and further analyses, including corrective actions, within 180 days of the date of the Generic Letter. The Supply System recommends that this completion period be extended to one year.

These extensions are recommended to provide additional time for the industry and regulatory agencies to refine the criteria for thermal binding susceptibility and operability criteria.

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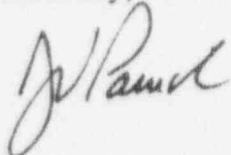
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COMMENTS ON PROPOSED GENERIC LETTER; PRESSURE LOCKING AND THERMAL BINDING OF SAFETY-RELATED POWER-OPERATED GATE VALVES (60 FR 15799)

Additionally, Attachment 2 of the proposed Generic Letter, Item 1, indicates that the staff will consider addressee justification for adequate actuator capability by analysis for small valves. The Supply System believes that the ability to justify actuator capability by analysis should not be restricted to the population of "small valves."

The Supply System appreciates the opportunity to review and comment on the proposed Generic Letter. Please contact me or Mr. Doug Coleman at (509) 377-4342 if you have any questions or would like to discuss our comments further.

Sincerely,

A handwritten signature in dark ink, appearing to read "JV Parrish", written in a cursive style.

JV Parrish (Mail Drop 1023)
Vice-President, Nuclear Operations

cc: C Callaway - NEI