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PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

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T. Scarbrough
A. Kugler

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Mr. David L. Meyer, Chief
Rules Review and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: PECO Energy Company
Comments Concerning NRC Proposed Generic Letter,
"Pressure Locking and Thermal Binding of Safety-
Related Power-Operated Gate Valves (60FR15799)

Dear Mr. Meyer:

This letter is being submitted in response to the NRC's request for comments concerning the proposed Generic Letter (GL), "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves," published in the Federal Register (i.e., 60FR15799, dated March 27, 1995). PECO Energy Company appreciates the opportunity to comment on this proposed GL, which is intended to ensure that appropriate actions are taken by the industry to ensure that safety-related power-operated gate valves that may be susceptible to pressure locking or thermal binding are capable of performing their required safety function.

PECO Energy endorses the comments provided by the Boiling Water Reactor Owners' Group (BWROG), and forwarded to the Nuclear Energy Institute (NEI), regarding this proposed GL. In particular, we offer the following comments and recommendations for consideration by the NRC in support of the BWROG's comments.

Comments on the Content of the Proposed GL

- 1) The aggressive completion schedule, i.e., 60 days for preliminary assessment and 180 days for full implementation, is considered unnecessarily rushed and inconsistent with the level of urgency which appears to characterize this issue. For example, an NRC-sponsored workshop was held on February 2, 1994, at which time the NRC indicated that a NUREG would be issued to acknowledge the industry issues raised at this meeting, and to document a broader discussion of these issues by the NRC in order to better define the technical bases for any subsequent GL. We are not aware that such a NUREG has ever been issued. In addition, more than one (1) year has passed since this workshop, and while the current proposed GL indicates continued regulatory concern, the NRC's own schedule concerning this issue does not seem to demonstrate the immediacy of any safety issue implied by such an aggressive schedule as stated in this proposed GL. Furthermore, the NRC is requesting licensees to re-evaluate earlier assessments of the impact of pressure locking/thermal binding (PL/TB) already performed on Motor-Operated Valves (MOVs) recommended by the NRC under GL 89-10 closure proceedings. It is doubtful that any high risk MOVs would have escaped such preliminary utility assessments due to the NRC's involvement during GL 89-10 closure inspection process. Therefore, this questions the need for such an aggressive

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schedule to be placed on the industry, as recommended in this proposed GL. Potential re-evaluation of previous MOV work, and addressing other MOVs will still require significant utility effort, and the 60 and 180 day completion periods recommended in the proposed GL appear unrealistic weighed against the lack of any strong evidence of an immediate safety concern.

Recommendation

Increase the period for completion of preliminary evaluation/analysis from 60 days to 120 days, and the period for complete implementation from 180 days to one (1) year or to the end of the next refueling outage, whichever is longer.

- 2) Required safety functions are not defined in this proposed GL, while great measure was taken to define guidance criteria in GL 89-10 (e.g. design-basis events (DBE)). Similar to the DBE definition in GL 89-10, we interpret "required safety functions" to mean those as documented in the Final Safety Analysis Reports (i.e., functions called out solely in Emergency Operating Procedures would not be applicable under this definition), and request that such definition be added to this proposed GL. Furthermore, any MOV that does not have an active safety function (i.e., any MOV previously determined to be outside the scope of GL 89-10), by definition, will be interpreted as not subject this proposed GL. Also, as with Supplement 4 to GL 89-10, we interpret that for Boiling Water Reactors (BWRs), valve mispositioning is not to be considered, and this exemption should be so noted in this proposed GL.

Recommendations

- Define "required safety functions" as those documented in the Final Safety Analysis Reports and exclude MOVs previously determined to be outside GL 89-10 program scope.
- Provide BWRs an exemption from valve mispositioning as a condition for which PL/TB must be a consideration consistent with the guidance specified in Supplement 4 to GL 89-10.

Comments on Attachment 1

Item 1

- 1) The draft GL states, "The evaluation should include consideration of the potential for gate valves to undergo pressure locking or thermal binding during surveillance testing."

As stated as a BWROG position on GL 89-10, the BWROG continues to believe that evaluations in most approved Final Safety Analysis Reports are based on assumptions that systems are in their normal standby condition at the start of an event because of the low probability of the system being in a test mode or out-of-service at the occurrence of an abnormal event. Therefore, detailed capability evaluations for PL/TB should not be required for valves "out of position" in a test mode. Valve repositioning from test modes is, in many cases, beyond the design bases for the required system(s) response times. Furthermore, PL/TB does not represent a common mode failure in these circumstances.

Recommendation

We suggest that this requirement be deleted.

- 2) We consider the word "unacceptable" in the statement, "Examples of unacceptable reasons for eliminating valves from consideration of pressure locking or thermal binding are (1) leakage rate, (2) engineering judgement without justification, and (3) lack of event occurrence at the specific plant," to be inflexible.

For example, use of the "leakage rate" basis may, in certain applications, be justifiable and technically defensible. Utilities must be allowed the option to define and defend any criteria they believe to be justified in arguing for the responsible elimination of unnecessary valves from further PL/TB review. Furthermore, "engineering judgement without justification" is considered redundant with Item 1.a in the section entitled "50.54(f) Information Request," of this proposed GL.

Recommendation

We recommend that the entire paragraph in Item 1 of Attachment 1 concerning this issue be deleted. If the NRC believes it is necessary to retain the spirit of item (3), we suggest relocating the item (3) statement to the front of the proposed GL as a general comment (e.g., "The lack of event occurrence at a specific plant is an unacceptable reason for eliminating valves from any consideration of pressure locking or thermal binding.")

Comments on Attachment 2

Item 1

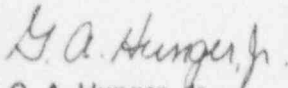
There has been no stated basis for limiting the ability to justify actuator capability by analysis to only "small valves." At the Winter 1993 MOV Users Group meeting, methodology was presented which described an analytical model for determining the thrust required to open a flexible wedge valve with bonnet pressure. Provided that input parameters can be bounded, this analysis technique should be able to be applied to any size valve. In addition, the posture taken by the NRC on this item appears to be inconsistent with its statement in Attachment 1, Item 2, where unrestricted "analysis" is considered acceptable, with the only caveat being that "uncertainties surrounding the prediction of the required thrust to overcome the phenomena should be included in the evaluation."

Recommendation

The ability to justify actuator capability by analysis should be more fully acknowledged and not restricted only to the population of "small valves."

If you have any questions, please do not hesitate to contact us.

Very truly yours,



G. A. Hunger, Jr.
Director - Licensing