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CP&L

Carolina Power & Light Company
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April 27, 1995

File: X-X-1107

Serial: NL&RAS-95-022

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

Dear Sir:

Subject: Comments on Draft Generic Letter on Pressure Locking and Thermal Binding
of Safety-Related Power-Operated Gate Valves (60 FR 15799, March 27,
1995)

The enclosed comments on the subject draft Generic Letter are submitted on behalf of
Carolina Power & Light Company (CP&L).

CP&L believes that the timetables proposed in the draft Generic Letter are unrealistic and
will not allow licensees to perform effectively the actions requested. The 60-day period
allotted to perform the requested evaluation of all safety-related power-operated gate valves
should be extended at least six months, and the 180-day period programmed for taking
corrective action should be extended to at least one refueling cycle after completing the
evaluation to allow the performance of corrective actions during scheduled shutdowns.

A more detailed discussion of our position is provided in the enclosure.

Sincerely,



R. E. Rogan
Manager
Nuclear Licensing and Regulatory Affairs

FAE/jbw
Enclosure

c: Mr. C. Calloway (NEI)
Mr. W. R. Campbell
Mr. H. W. Habermeyer, Jr.
Mr. K. R. Jury
Mr. J. C. Presley
Mr. L. S. Rowell

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**COMMENTS ON DRAFT GENERIC LETTER
PRESSURE LOCKING AND THERMAL BINDING OF SAFETY-RELATED
POWER-OPERATED GATE VALVES**

1. Sixty (60) days is viewed as an extremely short period of time in which to do a "preliminary" evaluation of all power-operated gate valves, since there are likely to be in excess of 100 such valves at a nuclear plant. This is especially true if the pressure locking and thermal binding phenomena have not been encountered during routine operation or surveillance testing. Six (6) months is proposed as a more reasonable time frame in which to complete this review. Guidance provided in Generic Letter 91-18 should be utilized during operability determinations when required. The basis for this position is that appropriate operating procedures and surveillance requirements presently exist and provide an adequate confidence level in safety-related valves. Unsatisfactory results would dictate appropriate actions and steps to be taken.
2. One hundred eighty (180) days is a relatively short period of time to implement corrective actions because it does not take into account the possible need for plant shutdowns to facilitate necessary modifications. If shutdowns are required, it is better to utilize planned refueling outages to effect the needed corrective actions. It is recommended that at least one (1) refueling cycle after completion of the evaluation be permitted to plan and implement appropriate corrective actions.