

**Florida  
Power**  
CORPORATION  
Crystal River Unit 3

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May 5, 1885  
NL95-0039

Docket 95-7431

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

11008  
60FR15799  
03/27/95  
T. Scambrough  
A. Kugler

Subject: Comments on Proposed Generic Letter; Pressure Locking and Thermal Binding of Safety-Related Power-Operated Valves [FR15799]

Dear Sir:

Appropriate members of the Florida Power Corporation (FPC) staff have reviewed the draft generic letter contained in the referenced notice and have the following comments. We recognize the comment period has closed; but, would appreciate your consideration of our comments on this important matter.

In the referenced notice the Nuclear Regulatory Commission (NRC) states an apparent conclusion that industry feedback is necessary to confirm that safety related (SR) power operated valves (POV) are capable of performing their safety function. This feedback is intended to ensure that licensees have evaluated POVs for susceptibility to pressure locking and thermal binding, and have taken appropriate actions. Florida Power Corporation (FPC) does not agree with this position. Temporary Instructions to inspection personnel, surveys or other means could accomplish such purpose. In order to support the concern the NRC continues by stating that there were only limited instances where licensees modified valves to alleviate pressure locking and thermal binding. FPC, has in fact, modified several valves to mitigate the effects of pressure locking.

In the "Purpose" section the NRC states: "...licenses are expected under existing regulations to take actions to ensure that safety-related power-operated gate valves susceptible to pressure locking and thermal binding are capable of performing their required safety functions." FPC is not certain whether this assertion is completely correct. However, if it is, the NRC's proposal to issue a generic letter is somewhat troubling. Either the existing regulations the NRC is alluding to are inadequate or license holders are inadequately applying these regulations. Neither of these possibilities will be resolved by publication or response to this generic letter.

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The effect of issuance of the generic letter is that licensees would be required to expend resources for gathering information and performing evaluations related to PL&TB and submit that information for review and acceptance by the NRC. It would appear more appropriate for licensees experiencing problems in this area to be held accountable for inadequately addressing the concern expressed in the "numerous generic communications" NRC has produced, instead of using a generic letter to "force" all licensees, including ones responsive to other efforts or requirements, to look at the issue one more time.

Appropriate backfit evaluations (and documented discussions) should reflect the cost and benefits derived from licensee actions taken to respond to the proposed generic letter assuming the licensee is complying with current regulations. If the current regulations are adequate and being complied with it is difficult to ascertain any benefit from this activity. The backfit discussion provided relies on and appears to expand the "compliance exception" for avoiding a full backfit analysis.

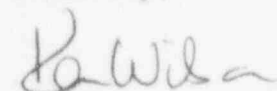
Attachment 1 provides guidance for addressing pressure locking and thermal binding. Such guidance does not constitute a requirement, yet previous similar guidance has been used as such. Therefore, either as a preface to this attachment, or within the body of the attachment itself, statements are needed clarify that this is only one method of handling these issues. Further, compliance with the guidance should be specifically included in the cost-benefit approach. In fact, the cost-benefit should focus on the costs of licensee and NRC activities to meet the level-of-detail contained in the Enclosure.

The information contained in the "Requested Actions" section should be placed in the "Requested Information" section, further defining what information is being requested. In addition, potentially susceptible valves do not require an operability evaluation. Only those valves that are determined to be significantly susceptible should be evaluated for operability impact.

The proposed generic letter intends to require addressees to provide a written response within 30 days indicating whether or not the requested actions will be implemented. It is an unreasonable expectation for a nuclear utility to review the contents of the generic letter, determine resource impact and schedule those resources, determine if an alternate approach is cost effective, and submit a response to the NRC documenting the utility's intent within 30 days.

As always we appreciate the opportunity to provide comments on proposed generic communications. We apologize for missing the closure of the comment period.

Sincerely,



Kenneth R. Wilson  
Manager, Nuclear Licensing

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