

The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

September 18, 1992

ST-HL-AL-4215
File No.: G02.04
10CFR50
10CFR2

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Reply to Inspection Followup Observations 498; 499/92026

Attached are South Texas Project (STP) responses to inspection followup observations 498; 499/92026, which were identified during inspection of the motor-operated valve program conducted on September 3-4, 1992.

If you have any questions concerning these responses, please contact Mr. S. D. Phillips at (512) 972-8472 or me at (512) 972-7205.

William J. Jump
William J. Jump
General Manager,
Nuclear Licensing

SDP/asg

Attachment: Reply to Inspection Followup
Observations 498;499/92026

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South Texas Project Electric Generating Station

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CC:

Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

George Dick, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
c/o U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. D. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

D. E. Ward/T. M. Puckett
Central Power and Light Company
P. O. Box 2121
Corpus Christi, TX 78403

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
P.O. Box 1088
Austin, TX 78767

K. J. Fiedler/M. T. Hardt
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61867
Houston, TX 77208

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Dr. Joseph M. Landrie
50 Bellport Lane
Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

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L4/NRC/

Reply to Inspection Follow Observations 498; 499/92026

Followup Observation - Item 1

Actuator run thrust capability determined using the actual degraded voltage V_{act} compared to the minimum required thrust value are adequate for the first pass to determine MOV operability. However, there is a need to investigate inaccuracies associated with torque switch repeatability between static and dynamic testing.

Response:

Actual test results will be adjusted appropriately to include all applicable inaccuracies and uncertainties. For valves which can not be dynamically tested at 80 to 100 percent of full differential pressure, the results will be extrapolated to 100 percent and adjusted to include the allowance for Load Sensitive Behavior.

Followup Observation - Item 2

The weak link and Maximum Expected Differential Pressure (MEDP) analysis for the High Head Safety Injection (HHSI) system valves A1SIMOV0006A, C1SIMOV0006C, A1SIMOV0008A, A2SIMOV0006A, and A2SIMOV0008A were reviewed. The calculations contain a scenario, in which these valves could be exposed to higher differential pressure, however, the calculations for the minimum required thrust were based on the lower differential pressure. The calculations did not document the reasons for using the lower differential pressure.

Response:

The subject calculations require additional documentation to demonstrate acceptance of the lower differential pressure value. Calculations will be amended with documentation which supports the selection of the lower differential pressure in the subject calculations and all other calculations where a lower differential pressure is used.

Followup Observation - Item 3

The STP use of running efficiency in the open direction should be discussed further with Limitorque to ensure the use of run efficiency is appropriate.

Response:

STP discussed this issue with Limitorque on September 14, 1992. Limitorque did not state whether we could use the running coefficient in the open direction instead of the pullout coefficient. However, STP has observed that the valve disc does not start moving out of the seat until after the hammer blow. STP MOVs have a "hammer blow" device and we have observed via the diagnostic signature that the motor is in full running condition before the hammer blow occurs. Signatures from two tests which show that the motor was in full running condition before hammer blow occurred have been provided to the staff.

Followup Observation - Item 4

"Stall thrust" vs "run thrust" terminology. The NRC suggested that it is not appropriate to call degraded voltage thrust (using a run coefficient) "stall thrust".

Response:

STP will refer to the thrust values calculated using degraded voltage and a running coefficient as "minimum running thrust".

Followup Observation - Item 5

The NRC indicated that the STP approach to deal with actuator overthrust is good, but Kalsi has a peer group review in progress and STP should wait until the results of this review become available prior to incorporating the Kalsi up-rating program into the STP MOV test plan.

Response:

STP will monitor the Kalsi peer review development prior to incorporating it into the STP MOV test plan. As discussed during the September 3-4, 1992, visit, STP expects to finish 1RE04 without leaving any MOVs in an overthrust condition.

Followup Observation - Item 6

The NRC will conduct a follow-up visit during the 1RE04 outage and during the week of November 16, 1992.

Response:

The MOV test schedule has been provided to the NRC resident inspector. This schedule is firm. However, if you plan to witness any specific activity, it would be beneficial to confirm the schedule one week prior to your arrival to be sure that there are no changes.