

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

October 2, 1992

WM 92-0158

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

- Reference:
- 1) Letter dated June 25, 1990 from J. G. Partlow, NRC to all Pressurized Water Reactor Licensees and Construction Permit Holders (Generic Letter 90-06)
 - 2) Letter ET 90-0190 dated December 21, 1990 from F. T. Rhodes, WCNOG to NRC
 - 3) Letter ET 91-0175 dated May 14, 1991 from F. T. Rhodes, WCNOG to NRC
 - 4) Letter dated July 30, 1992 from W. D. Reckley, NRC to B. D. Withers, WCNOG

Subject: Docket No. 50-482: Revised Response to Generic Letter 90-06, Resolution of Generic Issue 70, "Power-Operated Relief Valve and Block Valve Reliability," and Generic Issue 94, "Additional Low-Temperature Overpressure Protection for Light-Water Reactors"

Gentlemen:

This letter provides a revised response to Generic Letter 90-06, Resolution of Generic Issue 70, "Power-Operated Relief Valve and Block Valve Reliability," and Generic Issue 94, "Additional Low-Temperature Overpressure Protection for Light-Water Reactors." This revision is being made to address specific concerns that the staff had with Wolf Creek Nuclear Operating Corporation's (WCNOG) response to requested action 2 which requires the stroke testing of PORVs during Mode 3 (Hot Standby) or Mode 4 (Hot Shutdown) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection.

The attachment provides WCNOG's plans relating to the NRC requested actions concerning PORVs and block valves and to low-temperature overpressure protection. This response is identical to the original submittal with the exception of the response to requested action 2 which was revised to comply with the staff's position.

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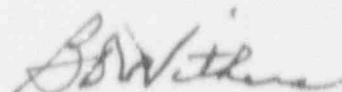
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If you have any questions concerning this matter, please contact me or Mr. Kevin J. Moles of my staff.

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/jra

Attachment

cc: A. T. Howell (NRC), w/a
J. L. Milhoan (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Bart D. Withers, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By

B. Withers
Bart D. Withers
President and
Chief Executive Officer

SUBSCRIBED and sworn to before me this 2 day of Oct, 1992.

Marlene Heathman
Notary Public

Expiration Date 8-4-94



REVISED RESPONSE TO GENERIC LETTER 90-06

REQUESTED ACTION:

1. Include PORVs and block valves within the scope of an operational quality assurance program that is in compliance with 10 CFR Part 50, Appendix B. This Program should include the following elements:
 - a. The addition of PORVs and block valves to the plant operational Quality Assurance List.
 - b. Implementation of a maintenance/refurbishment program for PORVs and block valves that is based on the manufacturer's recommendations or guidelines and is implemented by trained plant maintenance personnel.
 - c. When replacement parts and spares, as well as complete components, are required for existing non-safety-grade PORVs and block valves (and associated control systems), it is the intent of this generic letter that these items may be procured in accordance with the original construction codes and standards.

RESPONSE:

- 1.a. The PORVs and block valves are safety-related as described in Sections 3.11(B) and 5.4 of the Updated Safety Analysis Report and are included on the Wolf Creek Generating Station (WCGS) Q-list. The WCGS Q-list provides a listing of safety-related components.
- 1.b. Preventative maintenance on the PORVs and block valves is based on the manufacturer's recommendations and scheduled by the WCGS preventative maintenance program.
- 1.c. Since the PORVs and block valves are safety-related, replacement parts and spares are procured to the appropriate technical and quality requirements for the procurement to safety-related items in accordance with procedure KGP-1250, "Requisition & Procurement Process."

REQUESTED ACTION:

2. Include PORVs, valves in PORV control air systems, and block valves within the scope of a program covered by Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants," of Section XI of the ASME Boiler and Pressure Vessel Code. Stroke testing of PORVs should only be performed during Mode 3 (HOT STANDBY) or Mode 4 (HOT SHUTDOWN) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection. Stroke testing of the PORVs should not be performed during power operation. Additionally, the PORV block valves should be included in the licensee's expanded MOV test program discussed in NRC Generic Letter 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance," dated June 28, 1989.

RESPONSE:

The PORVs and block valves are included in the NRC approved WCGS Inservice Testing (IST) program. Procedure GEN 00-006, "Hot Standby to Cold Shutdown" requires that the PORVs are full stroke tested in accordance with surveillance test STS BE-204, "RCS Inservice Valve Test" prior to cooldown below 368°F. This Surveillance Test would, for WCNOG, be conducted during Mode 3 operation, consistent with the staff's position to ensure PORV operability for purposes of low-temperature overpressure protection. Once in cold shutdown, these valves will be retested in accordance with inservice testing requirements which will ensure that they are retested prior to being needed after a prolonged outage or following maintenance conducted on the PORVs. The PORV block valves are stroke tested quarterly in accordance with Technical Specification Surveillance Requirement 4.4.4.2. Additionally, the PORV block valves are contained in the Generic Letter 89-10 Motor Operated Valve Test Program. The test program for these valves is administered by procedure ADM 08-227, "Limitorqe Valve Program."

REQUESTED ACTION:

3. For operating PWR plants, modify the limiting conditions of operation of PORVs and block valves in the technical specifications for Modes 1, 2, and 3 to incorporate the position adopted by the staff in recent licensing actions. Attachment A-1 through A-3 are provided for guidance. The staff recognizes that some recently licensed PWR plants already have technical specifications in accordance with the staff position. Such plants are already in compliance with this position and need merely state that in their response. These recent technical specifications require that plants that run with the block valves closed (e.g., due to leaking PORVs) maintain electrical power to the demand. Additionally, plant operation in Modes 1, 2, and 3 with PORVs and block valves inoperable for reasons other than seat leakage is not permitted for periods of more than 72 hours.

Revise current technical specifications for overpressure protection to reduce the allowable outage time for a single channel from 7 days to 24 hours when the plant is operating in Modes 5 or 6 (see attachment B-1 to the Generic Letter).

RESPONSE:

WCNOG participated with six other utilities to develop a common approach to Generic Letter 90-06. The plants involved in this effort are: Callaway, Vogtle, Commanche Peak, Millstone 3, Seabrook, Byron, Braidwood, and Wolf Creek. This group was formed due to the lack of specific guidance and a sample technical specification for the use of either the PORVs or the residual heat removal (RHR) suction relief valves. A joint effort is possible due to the similarity of plant type and technical specifications. All the plants are Westinghouse pressurized water reactors which utilize the PORVs and RHR suction relief valves for low-temperature overpressure protection.

Attachment A-1 to the generic letter proposes modified standard technical specifications for Combustion Engineering and Westinghouse plants with two PORVs. Wolf Creek Nuclear Operating Corporation (WCNOC) intends to submit a license amendment request to Technical Specification 3/4.4.4 which follows the staff positions with plant specific alternatives.

Enclosure B of the generic letter was reviewed by the group and a proposed technical specification was developed that reflects the use of either the PORVs or the RHR suction relief valves. The proposed technical specification will require that at least two overpressure protection devices must be operable. This is , 2 PORVs or 2 RHR suction relief valves or 1 PORV and 1 RHR suction relief valve must be operable when cold overpressure protection is required. Additionally, the revised specification will adopt a 24 hour allowed outage time when only one overpressure protection device is available in Mode 5 or 6.

WCNOC intends to submit a supplement to the license amendment request to Technical Specification 3/4.4.4, Relief Valves and 3.4.9.3, Overpressure Protection System, to reflect the changes made by this revised response to Question 2. This supplement will be submitted by April 30, 1993.