

Maine Yankee

RELIABLE ELECTRICITY FOR MAINE SINCE 1972

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February 12, 1993
MN-93-18 JRH-93-32

UNITED STATES NUCLEAR REGULATORY COMMISSION
Attention: Document Control Desk
Washington, DC 20555

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) USNRC Letter to Maine Yankee dated November 16, 1992 - NRC Motor-Operated Valve Inspection Report No. 50-309/92-81
(c) Maine Yankee Letter to USNRC dated December 23, 1992 (MN-92-131) Response to Notice of Violation Associated with Reportability of LSI-M-11, 21, and 31

Subject: Status Update - NRC Motor-Operated Valve Inspection Report 50-309/92-81

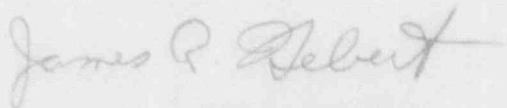
Gentlemen:

In 1992, an NRC Team conducted a Motor-Operated Valve (MOV) inspection at Maine Yankee. Reference (b) reported the results of the inspection. Maine Yankee responder to the Notice of Violation in the Inspection Report with Reference (c).

Reference (b) states that if our understanding of the actions to enhance the MOV programs as summarized in Table 1 of the report is different, then we are to notify the NRC as soon as possible. Maine Yankee would like to take this opportunity to provide our comments and clarifications on not only Table 1 of the report but also on certain aspects of the report itself. We believe these clarifications are necessary in order to more accurately reflect the status of the MOV program at Maine Yankee. These clarifications are provided as Attachment A.

Should you have any questions on the attached information, please contact us.

Very truly yours,



James R. Hebert, Manager
Licensing & Engineering Support Department

WBD/jag

Attachment

c: Mr. Thomas T. Martin
Mr. Charles S. Marschall
Mr. E. H. Trottier
Mr. Patrick J. Dostie
Mr. Peter Drysdale - NRC Region I

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ATTACHMENT A

Clarifications to MOV Inspection Report No. 92-81

1. Pg. 7 section 2.3, 1st Para., last sentence.

Maine Yankee does not generally use 12% inaccuracy for the VOTES equipment. The inaccuracy for each test setup depends on a number of variables.

2. Pg. 7, section 2.4, 2nd Para., last sentence.

The calculations were not complete for the 49 MOVs at the time of the inspection. Calculations have been performed for 47 of the 49 MOVs. However, because of improvements to the calculations and revisions from updated information (like degraded voltage), Maine Yankee does not consider the calculations complete. All calculations will be complete prior to our next outage that starts in August 1993.

3. Pg. 8, section 2.4, 2nd Para., next to last sentence and 5th Para., last sentence.

This is the same issue as discussed under Table 1, Para. 2.4, 2nd bullet. We did agree to evaluate the valve factor and ensure the MOV would operate. Maine Yankee is waiting for the EPRI test program results due in March 1994 to evaluate this information. The current plan is to evaluate the valve factors on a case by case basis. When the EPRI results are evaluated, a determination will be made regarding incorporation of new information as appropriate.

4. Pg. 10, section 2.4, 1st Para., last sentence.

Maine Yankee did not agree to review for adequate margins at the upper end of allowable thrust and torque settings. We have been concentrating on the lower end to ensure we have adequate thrust and torque to perform its safety function. Measured forces are set below weak link values, however, error is not considered. Since the weak link values are based upon Code allowable stresses and Limit torque ratings, the conservatism is sufficient to account for error.

5. Pg. 10, section 2.5, 2nd Para., last sentence.

The last sentence should say "The licensee acknowledged the teams concern and agreed to provide justification for each MOV that is not practicable and necessary to test."

6. Pg. 12, section 2.6, 4th Para., last sentence.

The last sentence should read: "Until a VOTES motor power test unit can be purchased, Maintenance Management has specified that a complete VOTES Static test be completed on all valves requiring post maintenance testing in place of the MOVATS MLU test."

7. Pg. 13, section 2.7, 4th Para.

Maine Yankee did not commit to include differential pressure testing on a periodic basis. The current requirements of the Generic Letter and its supplements specify that the design basis flow/dP test be performed only once, unless the MOV is changed such that the expected performance would be affected. The nature and need for periodic testing was not defined.

8. Pg. 14, section 2.8, 3rd Para.

The 5th sentence of the paragraph should have the word "would" changed to "could" (i.e., "it represented a condition that could have rendered the low pressure system inoperable and..."). Maine Yankee's engineering judgement at the time was that it was unlikely that the MOV would fail to open.

9. Pg. 18, section 5.0.

The Maine Yankee MOV Program did not state our position regarding diagnostic testing. Our letter response to GL 89-10 stated that we would diagnostically test all MOVs at design basis conditions "where practicable and necessary". As a benefit of using this approach, Maine Yankee has proven in Technical Evaluations that 5 MOVs in the Program are tested beyond design basis by a static stroke. Therefore, every time a Surveillance Test is performed, the MOV has met design basis test requirements. This approach results in lower radiation exposure to personnel. Maine Yankee plans on applying the two stage approach by evaluating the EPRI report and comparing the results with similar valve/operators in similar plant applications. Attachment 1 of the MOV Program and the MOV Program Flowcharts (FC7000) fully address implementation of the 2 stage process where and when applicable.

10. Table 1, Pg.2, 1st bullet.

This is related to Item 3 above. Maine Yankee plans on evaluating the test results and comparing them to the assumptions used to calculate the required thrust and torque, and make any changes necessary for operability. We do not plan on changing or validating assumptions unless we have an engineering basis to do so.