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Subject: Response to NRC Generic Letter 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves," for the Davis-Besse Nuclear Power Station

Ladies and Gentlemen:

This letter provides Toledo Edison's (TE) response for the Davis-Besse Nuclear Power Station (DBNPS) to Nuclear Regulatory Commission (NRC) Generic Letter (GL) 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves," dated September 19, 1996, (Log 4917).

The Generic Letter requested the following actions:

Each addressee of this generic letter is requested to establish a program, or to ensure the effectiveness of its current program, to verify on a periodic basis that safety-related MOVs continue to be capable of performing their safety functions within the current licensing bases of the facility. The program should ensure that changes in required performance resulting from degradation (such as those caused by age) can be properly identified and accounted for. Addressees that have developed periodic verification programs in response to GL 89-10 should review those programs to determine whether any changes are appropriate in light of the information in this generic letter.

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The GL requires that all holders of operating licenses for nuclear power reactors submit the following written response to the NRC.

1. Within 60 days from the date of this generic letter, a written response indicating whether or not the addressee will implement the action(s) requested herein. If the addressee intends to implement the requested action(s), the addressee shall submit a schedule for completing implementation. If an addressee chooses not to implement the requested action(s), the addressee shall submit a description of any proposed alternative course of action, the schedule for completing the alternative course of action (if applicable), and the safety basis for determining the acceptability of the planned alternative course of action.
2. Within 180 days from the date of this generic letter, or upon notification to the NRC of completion of GL 89-10 (whichever is later), the addressee shall submit a written summary description of its MOV periodic verification program established in accordance with the Requested Actions paragraph or the alternative course of action established by the addressee in response to item 1 above.

Toledo Edison Response

1. The current motor-operated valve (MOV) periodic verification program at the DBNPS was implemented following the ninth refueling outage (RFO) in the fall of 1994. The current program as described in the MOV Program Manual, satisfies the requested actions of GL 96-05. Static testing of all GL 89-10 valves every 5 years or three refueling outages, whichever is longer is incorporated into the program. In addition, dynamic testing is conducted on those valves for which testing is practicable and provides meaningful test results at the same frequency as static testing. This testing incorporates various methods of diagnostic testing, including, but not limited to, VOTES thrust and torque measurement, and motor power monitoring. This testing is effective in detecting age related degradation of MOV capability.

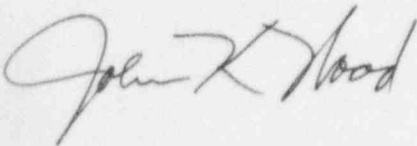
The DBNPS is currently evaluating the use of a periodic verification program which employs a blended approach of probabilistic and deterministic methods. In general, this methodology may be used to determine testing scope and frequency based primarily on margin and safety significance, and will also include consideration of such items as benefits and adverse effects of testing and MOV environment. If this evaluation indicates that implementation of a new periodic verification program would maintain the overall plant risk at acceptably low levels while reducing the cost of future implementation, it is projected that the program would then be revised by the end of the current operating cycle to allow implementation to begin during the Eleventh RFO scheduled to begin in April, 1998.

The present ASME Section XI In-Service Test (IST) Program will continue to be implemented in it's present form. However, changes to the current IST Program, for example justifying the use of periodic stroke testing in lieu of stroke time testing, may be reconsidered when our 10 year IST Program update is prepared for the third IST interval which begins in the year 2000.

2. A written summary description of the DBNPS MOV periodic verification program will be submitted by March 17, 1997.

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,



DLM/dlc

attachment

cc: A. G. Hansen, NRC/NRC Project Manager
A. B. Beach, Regional Administer, NRC Region III
S. Stasek, NRC Region III, DB-1 Senior Resident Inspector
J. R. Williams, Chief of Staff, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

RESPONSE TO NRC GENERIC LETTER 96-05

FOR

DAVIS-BESSE NUCLEAR POWER STATION

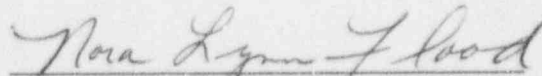
UNIT NUMBER 1

This letter is submitted in conformance with Atomic Energy Act of 1954 Section 182a as amended and 10 CFR 50.54(f), in response to NRC Generic Letter 96-05, (Log No. 4917), "Verification of Design Basis Capability of Safety-Related Motor-Operated Valves."

By:


J. K. Wood, Vice President - Nuclear

Swore and subscribed before me this 18th day of November, 1996.



Notary Public, State of Ohio

Nora Lynn Flood

My Commission expires September 3, 1997.