

January 8, 1997

Jerry E. Jackson
U. S. Nuclear Regulatory Commission
MS T10 E10
Washington, D.C. 20555

Dear Mr. Jackson:

As we discussed in the October 8, 1996 meeting with NRC personnel, selected Comanche Peak Motor-Operated Valves (MOVs) listed in Enclosure 3 to TXX-96371 have been reviewed relative to failure history.

Comanche Peak has requested IST extension from their current code requirements to an interval of 6 years. In an effort to provide information needed to evaluate potential candidate risk based inservice test (RBIST) MOVs at Comanche Peak for extended IST intervals, Oak Ridge National Laboratory (ORNL) has done a brief review of the available NPRDS failure records and performance data for the MOVs in question. The results of this review are provided in the attached summary report.

The summary report provides a review of motor-operated valve failures at Texas Utilities Company Comanche Peak Nuclear Generating Station, units 1 and 2. The time period covered is from 1990 (initial criticality for Unit 1) through 1995. Previous analysis of MOV failures has indicated that gate, globe, and butterfly valves comprise the largest fraction of the MOV population. Therefore, the data search was limited to these types of valves. The search resulted in the acquisition of 38 failure records. Only 3 of the 38 failures involved valves that were on the Comanche Peak extension request. Since the failure population relative to the extension request was so small, all failure records for this report were retained to provide at least a limited foundation for analysis.

The failures were categorized by functional area of the MOV assembly as valve (26%), actuator (61%), or electrical supply (13%). The results appear consistent with other failure studies for this component type when compared to the rest of the industry in that degraded or improperly set limit and torque switches account for a large fraction of the failures.

It has been concluded that the data examined are insufficient to support the extension of the in-service test interval to 6 years without the inclusion of other information such as frequency of operation, preventive maintenance practices and schedules, and operating environment. Since Comanche Peak is a relatively young plant, it is possible that degradation due to service wear will not be seen until more time in service has elapsed.

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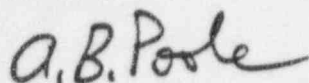
ATTACHMENT 3

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We hope this information will be useful to you. Should you have other questions or require additional information we would be glad to provide further assistance.

Sincerely,



A. B. Poole

ABP:jkc

Enclosure

cc/enc: P. L. Campbell, NRC
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