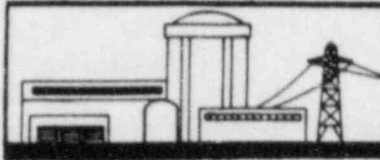


# THE B&W OWNERS GROUP

Arkansas Power & Light Company  
Duke Power Company  
Florida Power Corporation  
GPU Nuclear Corporation  
Sacramento Municipal Utility District

ANO-1  
Oconee 1, 2, 3  
Crystal River 3  
TMI-1  
Rancho Seco



Toledo Edison Company  
Tennessee Valley Authority  
Washington Public Power Supply  
System  
Babcock & Wilcox Company

Davis Besse  
Bellefonte 1, 2  
WNP 1

---

Working Together to Economically Provide Reliable and Safe Electrical Power

---

September 10, 1985

Suite 220  
7910 Woodmont Avenue  
Bethesda, Maryland 20814  
(301) 951-3344

Dr. Charles E. Rossi, Chief  
Events Analysis Branch  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Comments on Draft I&E Bulletin

Dear Dr. Rossi:

The following comments are provided in response to your letter to me dated August 12, 1985. The comments are of two types--the first being of a general nature and the second, more specific.

## General Comments

1. In reading the August 5, 1985 letter from Mr. Dircks, it seems logical that the AEOD valve failure survey should precede a decision to issue an I&E bulletin. In other words, the early release of this bulletin appears to have already concluded that such action is appropriate. It is not clear that this is the case.
2. The bulletin is quite prescriptive. It would seem preferable, once it has been determined that a bulletin is necessary, to succinctly state the concern about assuring the operability of safety related valves, and then to request industry input as to how this concern can best be addressed. The B&W Owners Group would welcome an opportunity to provide such input.
3. It would seem appropriate to consider all concerns stemming from the Davis-Besse event in a composite manner. This would preclude inefficient use of both staff and industry resources. The draft bulletin represents only one of the many items mentioned in Mr. Dircks' 8/5/85 letter.

8509130238 850910  
PDR I&E  
MISC PDR

IEI  
1/0

4. The need for this bulletin should be considered in view of related activities underway by NUMARC and INPO. It would seem particularly appropriate to consider recent actions which may not yet have had time to take effect.

#### Specific Comments

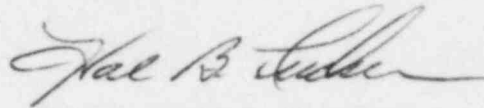
1. The requirement (Item a) to review the design basis for each valve is too broad and is considered unnecessary based on normal testing and maintenance activities being properly executed. The valves of concern should be limited to those that would experience significantly different conditions (i.e., temperatures, pressures and flows) during an off-normal event vs. those that would be encountered during normal operation and/or testing per Section XI of the ASME Code. For the latter set of valves, operation and testing as presently conducted would be sufficient to detect valves with improper settings and avoid failure scenarios. To include all valves in this review would require significant resources with little, if any, benefit for a majority of the valves involved.
2. Item b should read, "...review and revise as necessary the proper methods for setting...".
3. Comments on Item c:
  - Creating conditions involving the most severe loadings on valves is, in many cases, impractical.
  - The need for such testing has not been demonstrated, particularly where adequate design information has been utilized and maintenance activities are properly executed.
  - Valves may be potentially degraded for future service, if testing under severe conditions is conducted.
  - The cost associated with establishing required plant conditions and conducting testing is potentially very high particularly when additional outage time is required.
4. The draft bulletin strongly endorses MOVATS as an answer to the industry Limitorque actuator problem. It is inappropriate to restrict industry actions to a single approach. It is also appropriate to point out that the sensitivity of the MOVATS approach may be considerably more than is needed to deal with this specific concern. The key question is, "Can the valve be depended upon to perform its function in an emergency?" Because of the sensitivity of the techniques used, the information presented in Table 1 of the draft bulletin is misleading. It also would seem appropriate to permit evaluation of the referenced ORNL report, which is not yet available, before publishing the draft bulletin.

Dr. Charles E. Rossi, Chief  
Page 3  
September 10, 1985

In view of the above comments, it would seem appropriate to have further dialogue with representatives of industry prior to issuing the proposed bulletin.

One or more representatives of the B&W Owners Group utilities would be interested in participating in such a dialogue. If you have any questions concerning any of these comments or if you desire to have further input from industry, please call me or Mr. E. C. Simpson (813/866-4380), Chairman of the B&W Owners Group Steering Committee, or Mr. J. H. Taylor (804/385-2617) of B&W.

Very truly yours,



Hal B. Tucker, Chairman  
B&W Owners Group  
Executive Committee

HBT/JHT/1k

cc: E. C. Simpson  
Florida Power Corporation

J. H. Taylor  
Babcock & Wilcox Company

Frank J. Miraglia, Jr.  
Division Director  
Nuclear Regulatory Commission

A. Bivens  
Atomic Industrial Forum, Inc.