

Docket Nos. 50-282, 50-306, 50-263, 50-266,  
50-301, 50-305, and 50-244

January 7, 1994

Mr. Roger O. Anderson, Director  
Licensing and Management Issues  
Northern States Power Company  
414 Nicollet Mall  
Minneapolis, Minnesota 55401

Dear Mr. Anderson:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING GRADED APPROACH FOR  
GENERIC LETTER 89-10, SAFETY-RELATED MOTOR-OPERATED VALVE TESTING  
AND SURVEILLANCE

Meetings were held at NRC headquarters on June 7, 1993, and October 18, 1993,  
to discuss the cooperative efforts group process to develop a graded  
motor-operated valve testing program. Meeting summaries were published on  
June 15, 1993, and November 16, 1993.

Following these presentations, the staff has discussed your approach and has  
developed a number of questions. These questions are provided in Enclosure 1.  
Before the staff can continue evaluation of your process, a response to the  
enclosed questions is required. If you have any questions regarding this  
request, please contact Marsha Gamberoni on 504-3024 or Tom Scarbrough on  
504-2784.

The reporting and/or recordkeeping requirements contained in this letter  
affect fewer than ten respondents; therefore, OMB clearance is not required  
under P.L. 96-511.

Sincerely,

Original signed by

Marsha Gamberoni, Project Manager  
Project Directorate III-1  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosure:  
Comments on Cooperative Efforts

cc w/enclosure:  
See next pages

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COMMENTS ON COOPERATIVE EFFORTS GROUP PRESENTATION  
ON A GRADED APPROACH TO GENERIC LETTER 89-10  
(October 18, 1993)

1. As stated in paragraph 1 of Generic Letter 89-10, each licensee is required by 10 CFR 50.54(f) to notify the staff in writing of any changes to its commitments to GL 89-10 with justification retained on site. The Cooperative Efforts Group proposal for a "graded approach" to GL 89-10 constitutes a significant change to a licensee's commitment to test motor-operated valves (MOV) where practicable and would require a written submittal notifying the staff of the change.
2. In addition to changing its commitment to a graded approach, Monticello plans to extend its schedule for meeting its commitment to GL 89-10 beyond its original November 1994 completion date to Spring 1996. As indicated in paragraph 1 of GL 89-10, Monticello is required to notify the staff in writing of the schedule change. Supplement 6 to GL 89-10 (to be issued in the near future) will provide specific information that is needed by the staff to evaluate a licensee's justification for a change to its GL 89-10 schedule. Monticello should contact its NRR Project Manager to discuss the most efficient means of providing that information.
3. Monticello categorized its safety-related MOVs as either "important" or "unimportant" based on PRA and deterministic considerations. No concerns were identified with the licensee's prioritization of its MOVs in its GL 89-10 program. However, some of the reasons listed by the licensee of why an MOV could be considered "unimportant" are of concern (for example, redundancy). The staff would need to review each MOV placed into the "unimportant" category by a licensee.
4. Monticello stated that the "important" safety-related MOVs would have their performance justified "per differential pressure test or through industry efforts or grouping." Monticello stated that the "unimportant" safety-related MOVs would have their performance justified by "test or engineering analysis." Upon request by an NRC inspector, each licensee is responsible for demonstrating that any safety-related MOV can perform its safety function. It is not clear how the licensee will implement these two methods of justifying the performance of "important" and "unimportant" safety-related MOVs. If a licensee chooses not to test an MOV even though such testing is practicable, Supplement 6 to GL 89-10 should be referred to for information on the important considerations in grouping MOVs for the application of test data from one MOV to another.
5. Monticello indicated that static tests would be used in an effort to verify periodically the design-basis capability of safety-related MOVs. However, the licensee had not developed justification for the use of static test data to demonstrate design-basis capability. The licensee stated during the meeting that the "important" safety-related MOVs constitute 99.9% of the risk. If so, the licensee should consider using its graded-approach philosophy to enhance the basis of the method and increase the frequency for periodically verifying the design-basis capability of those "important" safety-related MOVs. The licensee proposes a 5 to 10 refueling cycle schedule for periodic verification of the design-basis capability of "unimportant" safety-related MOVs, but did not provide justification for this schedule beyond the recommended schedule in GL 89-10 for periodic verification.

6. Monticello indicated that static thrust tests would be used to demonstrate performance for post-maintenance testing. However, some maintenance might affect the performance of the valve that could only be revealed through dynamic testing. Also, some maintenance might affect the torque performance of the MOV.

Northern States Power Company

Monticello Nuclear Generating Plant  
and Prairie Island Nuclear  
Generating Plant

cc:

Mr. Roger O. Anderson, Director  
Licensing and Management Issues  
Northern States Power Company  
414 Nicollet Mall  
Minneapolis, Minnesota 55401

Kris Sanda, Commissioner  
Department of Public Service  
121 Seventh Place East  
Suite 200  
St. Paul, Minnesota 55101-2145

J. E. Silberg, Esquire  
Shaw, Pittman, Potts and Trowbridge  
2300 N Street, N. W.  
Washington DC 20037

Lisa R. Tiegel  
Assistant Attorney General  
Environmental Protection Division  
Suite 200  
520 Lafayette Road  
St. Paul, Minnesota 55155

U.S. Nuclear Regulatory Commission  
Resident Inspector Office  
2807 W. County Road 75  
Monticello, Minnesota 55362

Mr. E. L. Watzi, Site General  
Manager  
Prairie Island Nuclear Generating  
Plant  
Northern States Power Company  
1717 Wakonade Drive East  
Welch, Minnesota 55089

Site General Manager  
Monticello Nuclear Generating Plant  
Northern States Power Company  
Monticello, Minnesota 55362

Robert Nelson, President  
Minnesota Environmental Control  
Citizens Association (MECCA)  
1051 South McKnight Road  
St. Paul, Minnesota 55119

U.S. Nuclear Regulatory Commission  
Resident Inspector Office  
1719 Wakonade Drive East  
Welch, Minnesota 55089-9642

Commissioner  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55119

Mr. Jeff Cole, Auditor/Treasurer  
Goodhue County Courthouse  
Box 408  
Red Wing, Minnesota 55066-0408

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, Illinois 60532-4351

Commissioner of Health  
Minnesota Department of Health  
717 Delaware Street, S. E.  
Minneapolis, Minnesota 55440

Darla Groshens, Auditor/Treasurer  
Wright County Government Center  
10 NW Second Street  
Buffalo, Minnesota 55313

Dr. Robert C. Mecrady

R.E. Ginna Nuclear Power Plant

cc:

Thomas A. Moslak, Senior Resident Inspector  
R.E. Ginna Plant  
U.S. Nuclear Regulatory Commission  
1503 Lake Road  
Ontario, New York 14519

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

Ms. Donna Ross  
Division of Policy Analysis & Planning  
New York State Energy Office  
Agency Building 2  
Empire State Plaza  
Albany, New York 12223

Charlie Donaldson, Esq.  
Assistant Attorney General  
New York Department of Law  
120 Broadway  
New York, New York 10271

Nicholas S. Reynolds  
Winston & Strawn  
1400 L St. N.W.  
Washington, DC 20005-3502

Ms. Thelma Wideman  
Director, Wayne County Emergency  
Management Office  
Wayne County Emergency Operations Center  
7370 Route 31  
Lyons, New York 14489

Ms. Mary Louise Meisenzahl  
Administrator, Monroe County  
Office of Emergency Preparedness  
111 West Fall Road, Room 11  
Rochester, New York 14620

Mr. C. A. Schrock  
Wisconsin Public Service Corporation

Kewaunee Nuclear Power Plant

cc:

Mr. C. A. Schrock  
Manager - Nuclear Engineering  
Wisconsin Public Service  
Corporation  
Post Office Box 19002  
Green Bay, Wisconsin 54037-9002

Foley & Lardner  
Attention: Mr. Bradley D. Jackson  
One South Pinckney Street  
P. O. Box 1497  
Madison, Wisconsin 53701-1497

Chairman  
Town of Carlton  
Route 1  
Kewaunee, Wisconsin 54216

Mr. Harold Reckelberg, Chairman  
Kewaunee County Board  
Kewaunee County Courthouse  
Kewaunee, Wisconsin 54216

Chairman  
Public Service Commission of  
Wisconsin  
Hill Farms State Office Building  
Madison, Wisconsin 53702

Attorney General  
114 East, State Capitol  
Madison, Wisconsin 53702

U. S. Nuclear Regulatory Commission  
Resident Inspectors Office  
Route #1, Box 999  
Kewaunee, Wisconsin 54216

Regional Administrator - Region III  
U. S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, Illinois 60532-4531

Mr. Robert S. Cullen  
Chief Engineer  
Wisconsin Public Service Commission  
P. O. Box 7854  
Madison, Wisconsin 53707

Mr. Robert E. Link  
Wisconsin Electric Power Company

Point Beach Nuclear Plant  
Unit Nos. 1 and 2

cc:

Ernest L. Blake, Jr.  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, N.W.  
Washington, DC 20037

Mr. Gregory J. Maxfield, Manager  
Point Beach Nuclear Plant  
Wisconsin Electric Power Company  
6610 Nuclear Road  
Two Rivers, Wisconsin 54241

Town Chairman  
Town of Two Creeks  
Route 3  
Two Rivers, Wisconsin 54241

Chairman  
Public Service Commission  
of Wisconsin  
Hills Farms State Office Building  
Madison, Wisconsin 53702

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Resident Inspector's Office  
U.S. Nuclear Regulatory Commission  
6612 Nuclear Road  
Two Rivers, Wisconsin 54241