PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

April 14, 1994

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance - 10 CFR 50.54 (f)"
Changes to Testing Program Commitments

Gentlemen:

The NRC issued Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance -10 CFR 50.54(f)," on June 28, 1989, requesting that licensees develop and implement a program for the testing, inspection, and maintenance of safety-related motor-operated valves (MOVs) to provide the assurance that safety-related MOVs will function properly when subjected to the conditions expected during both normal operation and abnormal events within the design basis of the plant. The NRC requested that licensees respond, within six (6) months of the date of the GL, advising the NRC of the schedule for completing the recommended actions delineated in the GL. Accordingly, PECO Energy Company responded to GL 89-10 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, by letter dated December 28, 1989. Subsequently, by letter dated March 16, 1992, we submitted our program for testing MOVs at LGS and PBAPS, in which we committed to completing the testing of MOVs within five (5) years or three (3) refueling outages from the date of issuance of GL 89-10, whichever is later. We are currently scheduled to complete the testing activities by the following dates: LGS Unit 1 - June 1994, Unit 2 - March 1995, PBAPS Unit 2 - November 1994, and PBAPS Unit 3 - November 1995. These dates are based on refueling schedules and are consistent with our commitment.

PECO Energy has made a significant commitment of resources toward implementing the GL 89-10 Program at PBAPS and LGS. The purpose of this letter is to advise the NRC of the status of our actions and plans concerning the implementation of our GL 89-10 efforts, and to notify the NRC of planned changes to our MOV testing program being implemented at PBAPS and LGS as committed to in response to GL 89-10, Item I. In addition, this letter also provides a comparison between our planned changes to the MOV testing program and the guidance specified in GL

A064

89-10, Supplement 6, "Information on Schedule and Grouping, and Staff Responses to Additional Public Comments," issued on March 8, 1994. The following items discuss efforts that 1) have been taken, or are ongoing, in accordance with PECO Energy's commitments as documented in our response to GL 89-10 submitted by letters dated December 28, 1989 and March 16, 1992, or 2) involve the planned changes to our MOV testing program.

1. PECO Energy has developed, reviewed, and refined the scope of those MOVs that are applicable to GL 89-10 for both PBAPS and LGS. The design basis for operation of each MOV has been reviewed and documented. The NRC has reviewed this design basis information for the applicable MOVs during subsequent inspections of our GL 89-10 Program at PBAPS and LGS.

2. PECO Energy has developed MOV switch setting guidelines and implementing procedures. Switch settings for the MOVs have been established at both PBAPS and LGS through extensive in-situ testing using state-of-the-art diagnostic equipment and testing methods. All MOVs within the scope of GL 89-10 at PBAPS and LGS have previously been set up through in-situ static baseline testing. All MOVs have been or will be retested due to changes in the state-of-the-art test equipment and improved methodologies.

3. In order to appropriately focus resources needed to implement the GL 89-10 actions, PECO Energy has developed a graded approach to testing MOVs in the GL 89-10 Program. This graded approach constitutes a change to our previous commitments regarding implementation of our GL 89-10 Program for PBAPS and LGS. The graded approach includes MOV ranking based on safety significance combined with MOV grouping based on valve configuration and service condition similarity. This approach was presented to NRC representatives during a meeting held on October 19, 1993. Additionally, the grouping methodology considers the recommendations specified in Supplement 6 to GL 89-10. The results of this graded approach will be available for review upon completion.

4. An extensive program for in-situ dynamic testing of MOVs has been implemented at PBAPS and LGS. With the graded approach to testing MOVs, future dynamic testing of MOVs within the GL 89-10 Program will be implemented on a representative sample of safety significant MOVs that are in families containing MOVs which are practicable to test. As a result, MOVs of greater safety significance are tested on a priority commensurate with their safety significance. The samples will be at least 30%, or a minimum of two (2), of the safety significant MOVs in the family. This testing maintains our high level of confidence that each MOV, regardless of its safety significance, will perform its intended function when subjected to the conditions that are considered during both normal operation and abnormal events within the design basis of our plants. We expect to complete this testing by the original commitment dates specified in our responses to GL 89-10 dated December 28, 1989, and March 16, 1992.

5. We also plan to apply the graded approach to our periodic verification testing for MOVs within the GL 89-10 Program. Our periodic test intervals are being revised based on the safety significance of the MOVs. The maximum testing intervals for safety significant MOVs will range from two (2) to eight (8) fuel cycles. Non-safety significant MOVs will be tested on a post maintenance basis. Specific valve test intervals will be based on the maintenance and performance history as well as the safety significance of each MOV.

6. PECO Energy is actively involved in the Electric Power Research Institute (EPRI) efforts with the MOV Performance Prediction Program. We intend to apply the information derived from this program, as appropriate, to maintain our confidence that all MOVs within the scope of GL 89-10 will perform their intended function when required. We expect to complete this second stage of the "two-stage" program approach using EPRI information one year after the final EPRI MOV Performance Prediction Program methodology and results have been received, and applicable EPRI training has been completed.

Attachment 1 to this letter provides a list of MOVs in the PBAPS GL 89-10 Program. It includes information regarding valve families, ranking, and dynamic testing plans. Similar information for LGS is provided in Attachment 2. These lists, which are current as of this date, are submitted for your information and are subject to change as we proceed with the implementation of the testing program.

All valves which will not have their capability verified by in-situ dynamic testing will, as a minimum, be set up with the best generally available industry data. Additionally, reviews of non-safety significant valves have demonstrated a high performance margin for those valves. The basis for our confidence that these MOVs will perform their intended function will be available for review upon completion.

During a meeting between PECO Energy and NRC representatives on February 17, 1994, the NRC specifically requested that we delay submitting any information concerning changes to our MOV testing program pending issuance of GL 89-10, Supplement 6, at which time we should provide a comparison between our planned changes to the MOV testing programs being implemented at PBAPS and LGS and the guidance stipulated in GL 89-10, Supplement 6. The NRC issued GL 89-10, Supplement 6, on March 8, 1994. Therefore, in response to the NRC's request, we have provided the requested information in Attachment 3 of this letter.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director
Licensing Section

Attachments

cc: T. T. Martin, Administrator, USNRC, Region I (w/ attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ attachments)
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS (w/ attachments)

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

MOV GROUPINGS

PEACH BOTTOM UNITS 2 & 3 - HIGH RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED		VALVES IN FAMILY		
				UNIT 2	UNIT 3	COMMON
HIGH 1	H	2	HIGHEST ATTAINABLE	MO-2-12-015		
	H		HIGHEST ATTAINABLE	MO-2-12-018		
HIGH 2	H	1	HIGHEST ATTAINABLE		MO-3-12-015	
HIGH 3	H	1	HIGHEST ATTAINABLE		MO-3-12-018	
HIGH 4	H	2	HIGHEST ATTAINABLE	MO-2-13-015	MO-3-13-015	
	H		HIGHEST ATTAINABLE	MO-2-13-016	MO-3-13-016	
HIGH 5	H	0	NOT TESTABLE	MO-2-13-021	MO-3-13-021	
HIGH 6	H	2	NOT TESTABLE	MO-2-23-014	MO-3-23-014	
	H		HIGHEST ATTAINABLE	MO-2-23-015	MO-3-23-015	
	H		HIGHEST ATTAINABLE	MO-2-23-016	MO-3-23-016	
HIGH 7	H	0	NOT TESTABLE	MO-2-23-019	MO-3-23-019	
HIGH 8	H	2	HIGHEST ATTAINABLE	MO-2-10-025A	MO-3-10-025A	
	H		HIGHEST ATTAINABLE	MO-2-10-025B	MO-3-10-025B	
HIGH 9	H	2	0 DP TEST	MO-2-13-131	MO-3-13-131	

PEACH BOTTOM UNITS 2 & 3 - MEDIUM RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED		VALVES IN FAMILY		
				UNIT 2	UNIT 3	COMMON
MEDIUM 1	M	4	0 DP TEST	MO-2-10-039A	MO-3-10-039A	
	M		0 DP TEST	MO-2-10-039B	MO-3-10-039B	
	M		NOT TESTABLE	MO-2-10-174	MO-3-10-174	
	M		NOT TESTABLE	MO-2-10-176	MO-3-10-176	
MEDIUM 2	L	0	NOT TESTABLE	MO-2-10-089A		
	M		NOT TESTABLE		MO-3-10-089A	
	M		NOT TESTABLE	MO-2-10-089B		
	L		NOT TESTABLE		MO-3-10-089B	
	L		NOT TESTABLE	MO-2-10-089C		
	M		NOT TESTABLE		MO-3-10-089C	
	M		NOT TESTABLE	MO-2-10-089D		
	L		NOT TESTABLE		MO-3-10-089D	
MEDIUM 3	M	2	HIGHEST ATTAINABLE	MO-2-10-034A	MO-3-10-034A	
	M		HIGHEST ATTAINABLE	MO-2-10-034B	MO-3-10-034B	

PEACH BOTTOM UNITS 2 & 3 - LOW RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED		VALVES IN FAMILY		
				UNIT 2	UNIT 3	COMMON
LOW 1	L	2	HIGHEST ATTAINABLE	MO-2-01-074	MO-3-01-074	
	L		HIGHEST ATTAINABLE	MO-2-01-077	MO-3-01-077	
LOW 2	L	0	NOT TESTABLE	MO-2-02-053A	MO-3-02-053A	
	L		NOT TESTABLE	MO-2-02-053B	MO-3-02-053B	
LOW 3	L	0	NOT TESTABLE	MO-2-12-068	MO-3-12-068	
LOW 4	L	4	0 DP TEST	MO-2-10-154A	MO-3-10-154A	
	L		0 DP TEST	MO-2-10-154B	MO-3-10-154B	
LOW 5	L	2	HIGHEST ATTAINABLE	MO-2-35-2373	MO-3-35-3373	
	L		HIGHEST ATTAINABLE	MO-2-35-2374	MO-3-35-3374	
	LL		NOT TESTABLE	MO-2-14-070	MO-3-14-070	
	LL		NOT TESTABLE	MO-2-14-071	MO-3-14-071	
LOW 6	L	2	HIGHEST ATTAINABLE	MO-2-13-018	MO-3-13-018	
	LL		HIGHEST ATTAINABLE	MO-2-13-039	MO-3-13-039	
	LL		HIGHEST ATTAINABLE	MO-2-13-041	MO-3-13-041	
LOW 7	L	2	HIGHEST ATTAINABLE	MO-2-44-2200A	MO-3-44-3200A	
	L		HIGHEST ATTAINABLE	MO-2-44-2200B	MO-3-44-3200B	
	LL		HIGHEST ATTAINABLE	MO-2-44-2201A	MO-3-44-3201A	
	LL		HIGHEST ATTAINABLE	MO-2-44-2201B	MO-3-44-3201B	
LOW 8	L	0	NOT TESTABLE	MO-2-14-012A	MO-3-14-012A	
	L		NOT TESTABLE	MO-2-14-012B	MO-3-14-012B	
	LL		NOT TESTABLE	MO-2-14-011A	MO-3-14-011A	
	LL		NOT TESTABLE	MO-2-14-011B	MO-3-14-011B	
LOW 9	L	1	HIGHEST ATTAINABLE			MO-0-48-0841
LOW 10	L	1	HIGHEST ATTAINABLE			MO-0-33-0498
LOW 11	L	2	0 DP TEST	MO-2-32-2486	MO-3-32-3486	
LOW 12	L	0	NOT TESTABLE	MO-2-14-005A	MO-3-14-005A	
	L		NOT TESTABLE	MO-2-14-005B	MO-3-14-005B	
	L		NOT TESTABLE	MO-2-14-005C	MO-3-14-005C	
	L		NOT TESTABLE	MO-2-14-005D	MO-3-14-005D	
	LL		HIGHEST ATTAINABLE	MO-2-10-016A	MO-3-10-016A	
	LL		HIGHEST ATTAINABLE	MO-2-10-016B	MO-3-10-016B	
	LL		HIGHEST ATTAINABLE	MO-2-10-016C	MO-3-10-016C	
	LL		HIGHEST ATTAINABLE	MO-2-10-016D	MO-3-10-016D	

PEACH BOTTOM UNITS 2 & 3 - LOW-LOW RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED		VALVES IN FAMILY		
				UNIT 2	UNIT 3	COMMON
LOW-LOW 1	LL	0	NOT TESTABLE	MO-2-13-4244	MO-2-23-4245	
	LL		NOT TESTABLE	MO-3-13-5244	MO-3-23-5245	
LOW-LOW 2	LL	0	NOT TESTABLE	MO-2-48-2804A	MO-3-48-3804A	
	LL		NOT TESTABLE	MO-2-48-2804B	MO-3-48-3804B	
LOW-LOW 3	LL	0	NOT TESTABLE	MO-2-06-038A	MO-3-06-038A	
	LL		NOT TESTABLE	MO-2-06-038B	MO-3-06-038B	
LOW-LOW 4	LL	0	NOT TESTABLE	MO-2-10-026A	MO-3-10-026A	
	LL		NOT TESTABLE	MO-2-10-026B	MO-3-10-026B	
	LL		NOT TESTABLE	MO-2-10-031A	MO-3-10-031A	
	LL		NOT TESTABLE	MO-2-10-031B	MO-3-10-031B	
	LL		NOT TESTABLE	MO-2-32-2803	MO-3-32-3803	
LOW-LOW 5	LL	0	NOT TESTABLE			MO-0-48-0501A
	LL		NOT TESTABLE			MO-0-48-0501B
	LL		NOT TESTABLE			MO-0-48-0501C
	LL		NOT TESTABLE	MO-2-14-007A	MO-3-14-007A	
	LL		NOT TESTABLE	MO-2-14-007B	MO-3-14-007B	
	LL		NOT TESTABLE	MO-2-14-007C	MO-3-14-007C	
	LL		NOT TESTABLE	MO-2-14-007D	MO-3-14-007D	
	LL		HIGHEST ATTAINABLE	MO-2-23-017	MO-3-23-017	
	LL		HIGHEST ATTAINABLE	MO-2-23-057	MO-3-23-057	
	LL		HIGHEST ATTAINABLE	MO-2-23-058	MO-3-23-058	
LOW-LOW 6	LL	0	NOT TESTABLE			MO-0-48-0502A
	LL		NOT TESTABLE			MO-0-48-0502B
	LL		NOT TESTABLE			MO-0-48-0502C
LOW-LOW 7	LL	0	NOT TESTABLE	MO-2-10-017	MO-3-10-017	
	LL		NOT TESTABLE	MO-2-10-018	MO-3-10-018	
LOW-LOW 8	LL	0	NOT TESTABLE	MO-2-10-013A	MO-3-10-013A	
	LL		NOT TESTABLE	MO-2-10-013B	MO-3-10-013B	
	LL		NOT TESTABLE	MO-2-10-013C	MO-3-10-013C	
	LL		NOT TESTABLE	MO-2-10-013D	MO-3-10-013D	
LOW-LOW 9	LL	0	HIGHEST ATTAINABLE	MO-2-13-027	MO-3-13-027	
LOW-LOW 10	LL	0	NOT TESTABLE	MO-2-10-038A	MO-3-10-038A	
	LL		NOT TESTABLE	MO-2-10-038B	MO-3-10-038B	
LOW-LOW 11	LL	0	HIGHEST ATTAINABLE	MO-2-13-132	MO-3-13-132	
LOW-LOW 12	LL	0	HIGHEST ATTAINABLE	MO-2-23-025	MO-3-23-025	

ATTACHMENT 2

LIMERICK GENERATING STATION
UNITS 1 AND 2

MOV GROUPINGS

LIMERICK UNITS 1 & 2 - HIGH RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED	DP AT TEST CONDITION	VALVES IN FAMILY		
				UNIT 1	UNIT 2	COMMON
HIGH 1	H	2	NOT TESTABLE	HV-49-1F007	HV-49-2F007	
	H		HIGHEST ATTAINABLE	HV-49-1F008	HV-49-2F008	
HIGH 2	H	2	HIGHEST ATTAINABLE	HV-50-1F045	HV-50-2F045	
HIGH 3	H	2	HIGHEST ATTAINABLE	HV-44-1F001	HV-44-2F001	
	H		HIGHEST ATTAINABLE	HV-44-1F004	HV-44-2F004	
HIGH 4	H	2	NOT TESTABLE	HV-55-1F002	HV-55-2F002	
	H		HIGHEST ATTAINABLE	HV-55-1F003	HV-55-2F003	
HIGH 5	H	2	HIGHEST ATTAINABLE	HV-51-1F068A	HV-51-2F068A	
	H		HIGHEST ATTAINABLE	HV-51-1F068B	HV-51-2F068B	
HIGH 6	H	2	HIGHEST ATTAINABLE	HV-51-1F014A	HV-51-2F014A	
	H		HIGHEST ATTAINABLE	HV-51-1F014B	HV-51-2F014B	
HIGH 7	H	2	HIGHEST ATTAINABLE	HV-50-1F046	HV-50-2F046	
HIGH 8	H	2	HIGHEST ATTAINABLE	HV-56-1F059	HV-56-2F059	
	LL		NOT TESTABLE	HV-40-1F001B	HV-40-2F001B	
	LL		NOT TESTABLE	HV-40-1F001F	HV-40-2F001F	
	LL		NOT TESTABLE	HV-40-1F001K	HV-40-2F001K	
	LL		NOT TESTABLE	HV-40-1F001P	HV-40-2F001P	
	LL		NOT TESTABLE	HV-40-1F002B	HV-40-2F002B	
	LL		NOT TESTABLE	HV-40-1F002F	HV-40-2F002F	
	LL		NOT TESTABLE	HV-40-1F002K	HV-40-2F002K	
	LL		NOT TESTABLE	HV-40-1F002P	HV-40-2F002P	
	LL		NOT TESTABLE	HV-40-1F003B	HV-40-2F003B	
	LL		NOT TESTABLE	HV-40-1F003F	HV-40-2F003F	
	LL		NOT TESTABLE	HV-40-1F003K	HV-40-2F003K	
	LL		NOT TESTABLE	HV-40-1F003P	HV-40-2F003P	
	LL		NOT TESTABLE	HV-40-1F006	HV-40-2F006	
	LL		NOT TESTABLE	HV-40-1F007	HV-40-2F007	
	LL		NOT TESTABLE	HV-40-1F008	HV-40-2F008	
	LL		NOT TESTABLE	HV-40-1F009	HV-40-2F009	
	LL		NOT TESTABLE	HV-55-120	HV-55-220	
	LL		NOT TESTABLE		HV-55-221	
HIGH 9	H	0	NOT TESTABLE	HV-49-1F013	HV-49-2F013	
	LL		NOT TESTABLE	HV-49-1F012	HV-49-2F012	
HIGH 10	H	0	NOT TESTABLE	HV-55-1F105	HV-55-2F105	
HIGH 11	H	2	HIGHEST ATTAINABLE	HV-55-1F001	HV-55-2F001	
HIGH 12	H	0	NOT TESTABLE	HV-55-1F006	HV-55-2F006	

LIMERICK UNITS 1 & 2 - MEDIUM RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED	DP AT TEST CONDITION	VALVES IN FAMILY		
				UNIT 1	UNIT 2	COMMON
MEDIUM 1	M	2	HIGHEST ATTAINABLE	HV-87-122	HV-87-222	
	M		HIGHEST ATTAINABLE	HV-87-123	HV-87-223	
	L		HIGHEST ATTAINABLE	HV-87-128	HV-87-228	
	LL		NOT TESTABLE	HV-49-1F060	HV-49-2F060	
	LL		HIGHEST ATTAINABLE	HV-87-129	HV-87-229	
MEDIUM 2	M	0	NOT TESTABLE	HV-51-1F021A	HV-51-2F021A	
	M		NOT TESTABLE	HV-51-1F021B	HV-51-2F021B	
	L		NOT TESTABLE	HV-51-1F016A	HV-51-2F016A	
	L		NOT TESTABLE	HV-51-1F016B	HV-51-2F016B	
MEDIUM 3	M	5	HIGHEST ATTAINABLE	HV-87-120A	HV-87-220A	
	M		HIGHEST ATTAINABLE	HV-87-120B	HV-87-220B	
	M		HIGHEST ATTAINABLE	HV-87-121A	HV-87-221A	
	M		HIGHEST ATTAINABLE	HV-87-121B	HV-87-221B	
	L		HIGHEST ATTAINABLE	HV-87-124A	HV-87-224A	
	L		HIGHEST ATTAINABLE	HV-87-124B	HV-87-224B	
	L		HIGHEST ATTAINABLE	HV-87-125A	HV-87-225A	
	L		HIGHEST ATTAINABLE	HV-87-125B	HV-87-225B	
MEDIUM 4	M	2	0 DP TEST	HVC-41-1F020	HVC-41-2F020	
MEDIUM 5	M	2	DESIGN BASIS			TVC-11-053A
	M		DESIGN BASIS			TVC-11-053B
MEDIUM 6	M	0	NOT TESTABLE	HV-51-1F017A	HV-51-2F017A	
	M		NOT TESTABLE	HV-51-1F017B	HV-51-2F017B	
	M		NOT TESTABLE	HV-51-1F017C	HV-51-2F017C	
	M		NOT TESTABLE	HV-51-1F017D	HV-51-2F017D	
	L		NOT TESTABLE	HV-52-1F005	HV-52-2F005	
	L		NOT TESTABLE	HV-52-1F037	HV-52-2F037	

LIMERICK UNITS 1 & 2 - LOW RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED	DP AT TEST CONDITION	VALVES IN FAMILY		
				UNIT 1	UNIT 2	COMMON
LOW 1	L	2	HIGHEST ATTAINABLE	HV-49-1F019	HV-49-2F019	
LOW 2	L	2	HIGHEST ATTAINABLE	HV-55-1F012	HV-55-2F012	
LOW 3	L	2	HIGHEST ATTAINABLE	HV-51-1F027A	HV-51-2F027A	
	L		HIGHEST ATTAINABLE	HV-51-1F027B	HV-51-2F027B	
LOW 4	L	2	HIGHEST ATTAINABLE	HV-51-1F015A	HV-51-2F015A	
	L		HIGHEST ATTAINABLE	HV-51-1F015B	HV-51-2F015B	
LOW 5	L	2	HIGHEST ATTAINABLE	HV-51-1F010A	HV-51-2F010A	
	L		HIGHEST ATTAINABLE	HV-51-1F010B	HV-51-2F010B	
	LL		HIGHEST ATTAINABLE	HV-51-1F024A	HV-51-2F024A	
	LL		HIGHEST ATTAINABLE	HV-51-1F024B	HV-51-2F024B	
LOW 6	L	0	NOT TESTABLE	HV-55-1F093	HV-55-2F093	
	L		NOT TESTABLE	HV-55-1F095	HV-55-2F095	
LOW 7	L	0	NOT TESTABLE	HV-52-127	HV-52-227	
	L		NOT TESTABLE	HV-52-128	HV-52-228	
LOW 8	L	0	NOT TESTABLE	HV-57-161	HV-57-261	
	L		NOT TESTABLE	HV-57-163	HV-57-263	
LOW 9	L	0	NOT TESTABLE	HV-57-135	HV-57-235	
	L		NOT TESTABLE	HV-57-147	HV-57-247	
	LL		NOT TESTABLE	HV-57-115	HV-57-215	
LOW 10	L	2	DESIGN BASIS	HVC-51-1F048A	HVC-51-2F048A	
	L		DESIGN BASIS	HVC-51-1F048B	HVC-51-2F048B	
LOW 11	L	2	0 DP TEST	HV-46-128	HV-46-228	
	LL		0 DP TEST	HV-41-140	HV-41-240	
	LL		0 DP TEST	HV-41-141	HV-41-241	
	LL		0 DP TEST	HV-46-125	HV-46-225	
	LL		0 DP TEST	HV-46-126	HV-46-226	
	LL		0 DP TEST	HV-46-127	HV-46-227	
LOW 12	L	2	NOT TESTABLE	HV-42-147A	HV-42-247A	
	L		NOT TESTABLE	HV-42-147B	HV-42-247B	
	L		NOT TESTABLE	HV-42-147C	HV-42-247C	
	L		NOT TESTABLE	HV-42-147D	HV-42-247D	
	L		HIGHEST ATTAINABLE	HV-57-116	HV-57-216	
	LL		NOT TESTABLE	HV-59-101	HV-59-201	
LOW 13	L	2	HIGHEST ATTAINABLE	HV-57-168A	HV-57-268A	
	L		HIGHEST ATTAINABLE	HV-57-168B		
	L		NOT TESTABLE		HV-57-268B	
	L		NOT TESTABLE	HV-61-132	HV-61-232	
	LL		HIGHEST ATTAINABLE	HV-41-130A	HV-41-230A	
	LL		HIGHEST ATTAINABLE	HV-41-130B	HV-41-230B	
	LL		HIGHEST ATTAINABLE	HV-41-133A	HV-41-233A	
	LL		HIGHEST ATTAINABLE	HV-41-133B	HV-41-233B	
	LL		NOT TESTABLE	HV-61-112	HV-61-212	

LIMERICK UNITS 1 & 2 - LOW RISK FAMILIES (CONTINUED)

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED	DP AT TEST CONDITION	VALVES IN FAMILY		
				UNIT 1	UNIT 2	COMMON
LOW 14	L	0	NOT TESTABLE	HV-49-1F002	HV-49-2F002	
	LL		0 DP TEST	HV-48-1F006A	HV-48-2F006A	
	LL		0 DP TEST	HV-48-1F006B	HV-48-2F006B	
LOW 15	L	2	0 DP TEST	HV-41-142	HV-41-242	
	L		0 DP TEST	HV-41-143	HV-41-243	
	LL		HIGHEST ATTAINABLE	HV-41-1F016	HV-41-2F016	
	LL		HIGHEST ATTAINABLE	HV-41-1F019	HV-41-2F019	
LOW 16	L	2	HIGHEST ATTAINABLE	HV-11-105	HV-11-205	
	LL		0 DP TEST	HV-01-150	HV-01-250	
	LL		HIGHEST ATTAINABLE	HV-11-107	HV-11-207	
	LL		HIGHEST ATTAINABLE	HV-12-110	HV-12-210	
	LL		HIGHEST ATTAINABLE	HV-13-106	HV-13-206	
	LL		HIGHEST ATTAINABLE	HV-13-107	HV-13-207	
	LL		NOT TESTABLE	HV-51-105A	HV-51-205A	
	LL		NOT TESTABLE	HV-51-105B	HV-51-205B	
	LL		HIGHEST ATTAINABLE	HV-51-1F007A	HV-51-2F007A	
	LL		HIGHEST ATTAINABLE	HV-51-1F007B	HV-51-2F007B	
	LL		HIGHEST ATTAINABLE	HV-51-1F007C	HV-51-2F007C	
	LL		HIGHEST ATTAINABLE	HV-51-1F007D	HV-51-2F007D	
	LL		HIGHEST ATTAINABLE	HV-51-1F040	HV-51-2F040	
	LL		HIGHEST ATTAINABLE	HV-51-1F049	HV-51-2F049	
LOW 17	L	0	NOT TESTABLE	HV-57-105	HV-57-205	
	L		NOT TESTABLE	HV-57-111	HV-57-211	
LOW 18	L	2	HIGHEST ATTAINABLE	HV-57-109	HV-57-209	
	L		NOT TESTABLE	HV-57-162	HV-57-262	
	L		NOT TESTABLE	HV-57-164	HV-57-264	
	L		NOT TESTABLE	HV-57-166	HV-57-266	
	L		NOT TESTABLE	HV-57-169	HV-57-269	
LOW 19	L	0	NOT TESTABLE			TVC-90-042A
	L		NOT TESTABLE			TVC-90-042B
LOW 20	L	0	NOT TESTABLE			TVC-90-043A
	L		NOT TESTABLE			TVC-90-043B
	L		NOT TESTABLE			TVC-90-044A
	L		NOT TESTABLE			TVC-90-044B

LIMERICK UNITS 1 & 2 - LOW-LOW RISK FAMILIES

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED	DP AT TEST CONDITION	VALVES IN FAMILY		
				UNIT 1	UNIT 2	COMMON
LOW-LOW 1	LL		HIGHEST ATTAINABLE	HV-52-1F031A	HV-52-2F031A	
	LL		HIGHEST ATTAINABLE	HV-52-1F031B	HV-52-2F031B	
LOW-LOW 2	LL		NOT TESTABLE	HV-49-1F080	HV-49-2F080	
	LL		NOT TESTABLE	HV-49-1F084	HV-49-2F084	
LOW-LOW 3	LL		NOT TESTABLE	HV-55-1F072	HV-55-2F072	
LOW-LOW 4	LL		NOT TESTABLE	HV-52-1F001A	HV-52-2F001A	
	LL		NOT TESTABLE	HV-52-1F001B	HV-52-2F001B	
	LL		NOT TESTABLE	HV-52-1F001C	HV-52-2F001C	
	LL		NOT TESTABLE	HV-52-1F001D	HV-52-2F001D	
	LL		NOT TESTABLE	HV-55-1F042	HV-55-2F042	
	LL		HIGHEST ATTAINABLE	HV-55-1F004	HV-55-2F004	
LOW-LOW 5	LL		NOT TESTABLE	HV-51-1F073	HV-51-2F073	
	LL		NOT TESTABLE	HV-51-1F075	HV-51-2F075	
	LL		NOT TESTABLE	HV-51-125A	HV-51-225A	
	LL		NOT TESTABLE	HV-51-125B	HV-51-225B	
LOW-LOW 6	LL		NOT TESTABLE	HV-51-1F004A	HV-51-2F004A	
	LL		NOT TESTABLE	HV-51-1F004B	HV-51-2F004B	
	LL		NOT TESTABLE	HV-51-1F004C	HV-51-2F004C	
	LL		NOT TESTABLE	HV-51-1F004D	HV-51-2F004D	
LOW-LOW 7	LL		NOT TESTABLE	HV-41-1F032A	HV-41-2F032A	
	LL		NOT TESTABLE	HV-41-1F032B	HV-41-2F032B	
LOW-LOW 8	LL		HIGHEST ATTAINABLE	HV-55-1F041	HV-55-2F041	
LOW-LOW 9	LL		HIGHEST ATTAINABLE			HV-11-011A
	LL		HIGHEST ATTAINABLE			HV-11-011B
	LL		HIGHEST ATTAINABLE			HV-11-015A
	LL		HIGHEST ATTAINABLE			HV-11-015B
	LL		HIGHEST ATTAINABLE			HV-12-017A
	LL		HIGHEST ATTAINABLE			HV-12-017B
LOW-LOW 10	LL		HIGHEST ATTAINABLE			HV-12-031A
	LL		HIGHEST ATTAINABLE			HV-12-031B
	LL		HIGHEST ATTAINABLE			HV-12-031C
	LL		HIGHEST ATTAINABLE			HV-12-031D
	LL		HIGHEST ATTAINABLE			HV-12-032A
	LL		HIGHEST ATTAINABLE			HV-12-032B
	LL		HIGHEST ATTAINABLE			HV-12-032C
	LL		HIGHEST ATTAINABLE			HV-12-032D
	LL		HIGHEST ATTAINABLE			HV-12-034A
	LL		HIGHEST ATTAINABLE			HV-12-034B
	LL		HIGHEST ATTAINABLE	HV-12-111	HV-12-211	
	LL		HIGHEST ATTAINABLE	HV-12-113	HV-12-213	
LOW-LOW 11	LL		DESIGN BASIS	HV-12-112	HV-12-212	
	LL		DESIGN BASIS	HV-12-114	HV-12-214	
LOW-LOW 12	LL		NOT TESTABLE	HV-57-112	HV-57-212	
LOW-LOW 13	LL		NOT TESTABLE	HV-55-121		
	LL		NOT TESTABLE	HV-55-126		
LOW-LOW 14	LL		0 DP TEST	FVC-57-101A	FVC-57-201A	
	LL		0 DP TEST	FVC-57-101B	FVC-57-201B	
	LL		0 DP TEST	FVC-57-102A	FVC-57-202A	
	LL		0 DP TEST	FVC-57-102B	FVC-57-202B	
LOW-LOW 15	LL		HIGHEST ATTAINABLE	HV-13-108	HV-13-208	
	LL		HIGHEST ATTAINABLE	HV-13-111	HV-13-211	

LIMERICK UNITS 1 & 2 - LOW-LOW RISK FAMILIES (CONTINUED)

FAMILY RISK DESIGNATION	VALVE RISK CATEGORY	VALVES TO BE TESTED	DP AT TEST CONDITION	VALVES IN FAMILY		
				UNIT 1	UNIT 2	COMMON
LOW-LOW 16	LL		DESIGN BASIS	HV-57-160A	HV-57-260A	
	LL		DESIGN BASIS	HV-57-160B	HV-57-260B	
	LL		HIGHEST ATTAINABLE	HV-49-1F010	HV-49-2F010	
	LL		HIGHEST ATTAINABLE	HV-49-1F029	HV-49-2F029	
	LL		HIGHEST ATTAINABLE	HV-49-1F031	HV-49-2F031	
LOW-LOW 17	LL		NOT TESTABLE	HV-55-1F007	HV-55-2F007	
LOW-LOW 18	LL		NOT TESTABLE	HV-51-1F008	HV-51-2F008	
	LL		NOT TESTABLE	HV-51-1F009	HV-51-2F009	
LOW-LOW 19	LL		NOT TESTABLE	HV-52-139	HV-52-239	
	LL		HIGHEST ATTAINABLE	HV-57-110A	HV-57-210A	
	LL		HIGHEST ATTAINABLE	HV-57-110B	HV-57-210B	
	LL		HIGHEST ATTAINABLE	HV-57-165	HV-57-265	
	LL		HIGHEST ATTAINABLE	HV-57-167	HV-57-267	
	LL		HIGHEST ATTAINABLE	HV-59-140	HV-59-240	
	LL		HIGHEST ATTAINABLE	HV-59-141	HV-59-241	
	LL		HIGHEST ATTAINABLE	HV-59-142	HV-59-242	
	LL		HIGHEST ATTAINABLE	HV-59-143	HV-59-243	
	LL		NOT TESTABLE	HV-59-151A	HV-59-251A	
	LL		NOT TESTABLE	HV-59-151B	HV-59-251B	
	LL		HIGHEST ATTAINABLE	HV-49-1F076	HV-49-2F076	
	LL		HIGHEST ATTAINABLE	HV-55-1F100	HV-55-2F100	
LOW-LOW 21	LL		0 DP TEST	HV-01-111	HV-01-211	
LOW-LOW 22	LL		0 DP TEST	HV 01-108	HV-01-208	
	LL		0 DP TEST	HV-01-109	HV-01-209	
LOW-LOW 23	LL		NOT TESTABLE	HV-52-1F004A	HV-52-2F004A	
	LL		NOT TESTABLE	HV-52-1F004B	HV-52-2F004B	

ATTACHMENT 3

PECO ENERGY COMPANY RESTRUCTURED
GL 89-10 PROGRAM
COMPARISON TO GL 89-10, SUPPLEMENT 6

PECO Energy Restructured GL 89-10 Program
Comparison to GL 89-10 Supplement 6

Generic Letter 89-10, Supplement 6 "INFORMATION ON SCHEDULE AND GROUPING, AND STAFF RESPONSES TO ADDITIONAL PUBLIC QUESTIONS" provides NRC staff positions on schedule for completing MOV testing and grouping of MOVs. This discussion describes how these topics are addressed in the PECO Energy GL 89-10 Program.

SCHEDULE

PECO Energy committed to completing the GL 89-10 Program actions by the following dates:

Limerick Unit 1	June, 1994,
Limerick Unit 2	2R03 (March, 1995),
Peach Bottom Unit 2	2R10 (November, 1994), and
Peach Bottom Unit 3	3R10 (November, 1995).

No extension of these scheduled commitment dates is planned. PECO Energy is planning to document the basis for confirming the capability of each MOV to perform its design basis function(s) by these commitment dates which, for Limerick Unit 1, is June 1994.

MOV GROUPING

PECO Energy has restructured the GL 89-10 Programs at Limerick and Peach Bottom to include MOV ranking according to safety significance along with the previous MOV grouping to focus our in-situ dynamic tests on safety significant MOVs. The application of MOV grouping to the GL 89-10 Programs includes the following considerations:

1) All GL 89-10 MOVs, regardless of MOV grouping, are being set up through static diagnostic testing based on the best available data.

2) The MOV groups are being established based on similarities in valve manufacturer, model, pressure class and size; valve service conditions including flow, temperature, pressure, and installation configuration; valve materials of construction; and seat/guide stress levels. MOV performance during static and dynamic testing is reviewed for anomalous behavior as the test results are evaluated.

3) Future dynamic testing of MOVs will be implemented on representative samples of MOV families such that the MOVs of greater safety significance are tested on a priority commensurate with their safety significance. MOV safety significance includes both impact on plant risk and MOV performance margin. The representative samples will be at least 30%, with a minimum of two, of the safety significant MOVs in the family. Non-safety significant MOVs will be set up with the best available data which will include, where available, plant specific dynamic test data from similar MOVs.

4) The meaningful results of the dynamic tests performed, including valve factor, stem friction, and rate of loading, will be applied to all MOVs in a group.

5) The methodology for application of test data from tested MOVs to the remaining MOVs within the GL 89-10 family is currently under development.

SUMMARY

Relative to NRC staff positions on schedule, PECO satisfies all guidance in that no extensions to the existing commitment dates are planned. Relative to NRC staff positions on grouping of MOVs, PECO satisfies all guidance with the exception of not performing additional dynamic testing on non-safety significant MOVs. Non-safety significant MOVs will be set up with the best available data which will include, where available, plant specific dynamic test data from similar MOVs.

Relative to NRC staff positions provided in Enclosure 1 to the Supplement regarding program approach, scope, the use of PSA studies, MOV sizing and switch settings, MOV testing, periodic verification, post maintenance testing, and pressure locking & thermal binding, PECO is meeting or exceeding NRC guidance with the following exceptions. PECO is not planning to perform dynamic testing on non-safety significant MOVs. Also, PECO is planning to use static testing to perform periodic verification. Justification for these positions is under development.

PECO Energy has restructured the GL 89-10 test programs into a graded approach including MOV grouping and consideration of MOV safety significance. The graded approach includes focusing the dynamic test program on safety significant MOVs. The restructured approach, including justification for not dynamically testing additional non-safety significant MOVs, has been discussed with the NRC and is considered to be a viable alternative approach. Justification for this graded approach is nearing completion.