



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

APR 1 - 1994

Docket Nos. 50-361 and 50-362

Southern California Edison Company
Irvine Operations Center
23 Parker Street
Irvine, California 92718

Attention: Mr. Harold B. Ray, Senior Vice President, Nuclear

SUBJECT: REPLY TO SCE RESPONSE TO NOTICE OF DEVIATION
(NRC INSPECTION REPORT 50-361,362/93-36)

Thank you for your letter of February 11, 1994, in response to our Notice of Deviation and Inspection Report No. 50-361/93-36 and 50-362/93-36, informing us of the steps you have taken to correct the items which we brought to your attention.

In your response to the Notice of Deviation, you stated that SCE did contact Limitorque in April 1992 to obtain concurrence in your operability assessment of the low DC voltage applications of Limitorque actuators at SONGS Units 2 & 3. Although you were unsuccessful at that time in obtaining the vendor's support for your analysis method, you stated that this contact was specifically made to satisfy your commitment as described in NRC Inspection Report 92-02. Furthermore, your response stated that SCE will reanalyze the DC motor-operated valves (MOVs) using the Limitorque methodology and/or obtain motor-specific performance data as the basis for your Generic Letter (GL) 89-10 design basis calculations. You also stated that SCE will complete these actions prior to the completion of the Cycle 8 refueling outage.

Based on this additional information, which was not provided to the inspector at the time of the inspection, and the corrective actions which you have committed to take, we have decided to retract the Notice of Deviation. We will revise our records to reflect this.

Despite this action, we want to reemphasize our previous conclusion that the method used to analyze the MOV's performance under degraded voltage conditions lacked a sound engineering basis. As your response clarified, you had committed to not use motor-stall torque to determine the MOV capabilities. However, your response also indicates that you meet this commitment by using a methodology that determines the motor torque from the locked-rotor current under degraded voltage conditions. We maintain that the use of a motor torque that is derived from the locked-rotor current is very similar to the use of motor-stall torque, in that both motor torque values are ultimately obtained from generic motor curves. Absent further technical justification, we do not consider the use of generic motor curves to be appropriate, without

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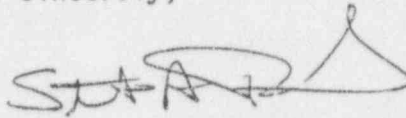
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motor-specific performance data to support MOV actuator performance in excess of the manufacturer's rating.

Despite this concern, the corrective actions that you identified in your response appear to be adequate to resolve our technical concerns regarding the MOV actuator performance; therefore, no further clarification is needed. Your corrective actions will be verified in a future inspection.

Your cooperation in this matter is appreciated.

Sincerely,



S. A. Richards, Acting Director
Division of Reactor Safety
and Projects

cc:

Mr. Edwin A. Guiles, Vice President Engineering & Operations, San Diego Gas and Electric Co.
T. E. Oubre, Esq., Southern California Edison Company
Chairman, Board of Supervisors, County of San Diego
Mr. Sherwin Harris, Resource Project Manager, Public Utilities Department
Mr. Charles B. Brinkman, Manager, ABB Combustion Engineering Nuclear Power
Mr. R. W. Krieger, Vice President, Southern California Edison Company
Mr. Don J. Womeldorf, Chief, Environmental Management Branch
Mr. Thomas E. Bostrom, Project Manager, Bechtel Power Corporation
Mr. Robert G. Lacy, Manager Nuclear Department
Mr. Steve Hsu, Radiologic Health Branch
Mayor, City of San Clemente

bcc w/enclosure:
 Docket File
 Resident Inspector
 Project Inspector
 G. Cook
 B. Faulkenberry
 K. Perkins
 S. Richards
 H. Wong, Project Section Chief

bcc w/o enclosure:
 M. Smith
 D. Clevenger

WPA 4/1/94

*CAV
3/18/94*

Myers *[Signature]* Huey *[Signature]* Ang *[Signature]* Richards *[Signature]*

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NO <input type="checkbox"/>	NO <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

SEND TO DCS 1 YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	SEND TO PDR YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
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