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September 20, 1995

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Subject: Docket No. 50-361 and 50-362
NRC Inspection Report 50-361/95-13 and 50-362/95-13
San Onofre Nuclear Generating Station (SONGS) Units 2 and 3

The purpose of this letter is to provide additional information regarding two NRC comments documented in the subject inspection report, as follows:

MOV LUBRIC TION PROGRAM

The second page of the subject inspection report summary, under the heading of Engineering, reads in part,

> While long in coming, the recently developed program for assessing replacement frequency of motor-operated valve grease appeared thorough....

Edison disagrees with the phrase "while long in coming...". The associated inspection report section 5.3 discussing this issue provides no basis in fact for this opinion. Edison believes a review of the facts and circumstances, provided below, indicates a prudent and timely evolution of the grease program.

At initial licensing in 1983, the grease inspection program was based on Limitorque's "Lubrication, Inspection Procedure and Data" vendor manual which recommends grease inspection "...every 18 months or until operating experience indicates otherwise." In 1988, Edison had developed sufficient operating experience to justify a change to every three fuel cycles.

The following year, Generic Letter (GL) 89-10 was issued, causing Edison, over a five year period, to modify our programs to test and maintain motor-operated valves (MOVs). Our GL 89-10 effort

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will be complete by the end of the current refueling outage on SONGS Unit 3.

As part of the GL 89-10 program to enhance MOV preventive maintenance, Edison modified the "every three cycles" grease inspection frequency to incorporate a new methodology which accommodates the different MOV environments (e.g., temperature, gear speed, etc.), and the relative safety significance of the MOV application. It is expected all GL 89-10 MOVs will be incorporated into the enhanced preventive maintenance program by the end of 1995, which is compatible with the final NRC approved implementation date for GL 89-10.

In summary, Edison believes the NRC has mis-characterized the timeliness of the MOV lubrication inspection program by describing it as "long in coming." We believe the program was developed in a timely manner, concurrently with the NRC approved schedule for GL 89-10 implementation.

WORK AROUNDS

Inspection Report 95-13, Section 2.3, "Unit 2 Power Ascension on June 14, 1995," characterizes the following as a work around:

> The high pressure turbine governor valves provided secondary steam pressure oscillations which led to reactor coolant temperature swings at low power... The licensee had modified these valves during the Cycle 8 outage, in order to decrease steam differential pressure, and the valves now provided the oscillations when not fully open. The inspector considered this was due to a design problem which the licensee was already aware of and was reviewing at the end of the inspection period.

The noted pressure/temperature oscillations were not expected as a result of the modifications to the High Pressure (HP) governor valves. Considerable design efforts, including prototype valve testing, had been done to ensure the new design would not have abnormal flow induced pressure disturbances.

Edison does not believe the modifications to the HP governor valves were the cause of the secondary steam pressure oscillations. The oscillations occurred independent of the governor valve modification and in spite of diligent design

engineering efforts and prototype testing to ensure the design is stable. The magnitude of the oscillations was such that the appropriate management action was to continue the unit return to service while additional information was obtained to determine the root cause.

In contrast, Edison defines an operator "work around" to be an action performed by operators so that a responsible resolution of a plant problem can be avoided. There is no such element of avoidance of responsible conduct in this instance.

If you have any further questions or comments please call me.

Sincerely,

P M Breedlove

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