

**Response to Public Comments for Draft Regulatory Guide DG-1264,
“Thermal Overload Protection for
Electric Motors on Motor Operated Valves”**

Proposed Revision 2 of Regulatory Guide 1.106, dated March 1977

A notice soliciting comments on DG-1264 (proposed Revision 1 of Regulatory Guide 1.106) was published in the Federal Register on April 28, 2010, (75 FR 58444). Comments were received from NEI (ML11187A201) and the resolution of the comments is found below.

No.	DG Section	Originator	Industry Comment	NRC Response (finalized 2/15/2012)
1	Regulatory Position	J. C. Butler (NEI) (ML11187A201)	<p>The Regulatory Guide provides guidance intended to ensure that thermal overload protection devices will not needlessly prevent a motor-operated valve motor from performing its safety-related function. In Section C, the Regulatory Positions should take into account the motor-operated valve application when establishing the condition of the thermal overload protection devices.</p> <p>The Regulatory Guide should clarify that for valves that have an immediate safety function, any option that bypasses the thermal overload protection can be used, at the discretion of the designer, using the IEEE Standards referenced.</p>	<p>The staff agrees with the comment, but believes that the existing discussion in Section C satisfies the comment. In Staff Regulatory Guidance Position 1 the regulatory guide takes into account the motor-operated valve application, and addresses valves that are required to function immediately during a Design Basis Event or Station Blackout. It also addresses valves that operate during normal plant conditions, and it addresses motor operated valves that do not have an immediate safety function. Inasmuch as the existing discussion reflects the underlying technical position presented in the comment, no changes were made to the regulatory guide in response to this comment.</p> <p>The staff agrees with the underlying position expressed in the comment, but believes that the RG need not be revised to make this point explicitly. For valves that have an immediate safety function, the designer can implement at his discretion any of the options that bypasses the thermal overload protection using the specified sections of Standard IEEE 603-2009 in the regulatory guide. The staff does not believe that the designer’s discretion in this regard needs any specific discussion in the RG. Accordingly, no changes were made to the regulatory guide in response to this comment.</p>