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SUBJECT: RD: on 870508, App R violation due to nonseparation of redundant pressurizer level transmitters discovered. Caused by failure to reroute one train of pressurizer level instrumentation through penetration room.

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August 12, 1987

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

Subject: Oconee Nuclear Station, Units 2 and 3
Docket Nos. 50-270, -287
Pressurizer Level Transmitters

Gentlemen:

On May 6, 1987 at 1500 hours, a 10CFR50, Appendix R violation due to the non-separation of redundant pressurizer level transmitters was discovered on Units 2 and 3. This incident was not determined to be reportable per 10CFR 50.73 requirements, however Duke is providing the proceeding description, resolution, and analysis of the occurrence on a voluntary basis.

Oconee Units 2 and 3 both have three pressurizer level transmitters LT4P1, LT4P2, and LT4P3 which feed the Integrated Control System (ICS) as well as LT72 which feeds the Standby Shutdown Facility (SSF). All transmitters are currently functional, however all cables are routed through West side penetrations. Therefore, there is no guarantee that pressurizer level indication would be available following a fire in the West penetration room.

Nuclear Station Modification (NSM) ON-1012 Rev. 2 part H-24 was to have rerouted transmitter LT4P1 through an East penetration (EA7), however this NSM was only partially completed. The affected drawings were updated to show the job completed although part H-24 only pulled the necessary cables. No package was ever done to terminate the cables and check out the transmitter.

The proposed resolution to this incident is to complete the modification by terminating the previously pulled cables and checking out the transmitter. This work will be performed during the End of Cycle (EOC) 9 refueling outage for Unit 2 and the EOC 10 refueling outage for Unit 3.

This Appendix R violation occurred due to the failure to reroute one train of pressurizer level instrumentation through the East penetration room. Consequently, there is no guarantee that pressurizer level indication would be available following a fire in the West penetration room. For this type of event, the plant would be taken to hot shutdown using balance of plant, not SSF equipment.

Pressurizer level provides the only direct indication of primary system inventory. However, information about Reactor Coolant System (RCS) inventory could be inferred using available instrumentation, specifically RCS temperature and pressure.

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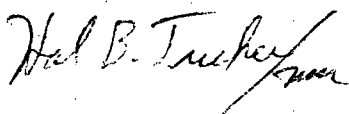
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In this scenario at least one High Pressure Injection (HPI) pump is available to provide significant makeup flow in the event that inventory reduction is indicated. Excessive inventory, although undesirable, could be accommodated since the HPI pump can replace the water which would be lost if a PORV sticks open. Therefore, pressurizer level instrumentation is not absolutely necessary for achieving hot shutdown using balance of plant equipment following an Appendix R fire.

Very truly yours,



Hal B. Tucker

PJN/218/jgc

Attachment

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