Central Files

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January 30, 1981

Mr. Boyce H. Grier
Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

RE: Docket No. 50-220
I.E. Bulletin 80-17 Supplement No. 4

Dear Mr. Grier:

The following response summarizes action taken for Items 1 thru 6 of this Bulletin.

Item No. 1 - Bench Test of CMS

Our CMS vendor, General Electric, has submitted information to satisfy Items (a) through (c) to Mr. V.R. Mills of the NRC's I.E. Office on December 12, 1980, G.E. Letter No. GEA1-0-190. Item (d) Qualifications of Instrument Technicians involved in performing the Calibration Test are covered within the scope of Technician grade level requirements. Also, a qualified Level III NDE UT examiner verified testing performance.

Item No. 2 - Operability Test of CMS

Prior to conducting the operability tests, it was verified that the CMS on the SDV was installed and calibrated in accordance with vendor recommendations, using a Preoperational Test and Instrument Surveillance Test.

An operability test of the CMS was performed during a shutdown on December 20, 1980. In this test, a sufficient amount of water was injected into each header by backfilling the SDV piping to verify coupling and alarm functions. The independent level measurement used to verify proper CMS operation and calibration was the manual UT method and a water level sight glass.

Satisfactory CMS performance was verified through this testing. Also, the proper water alarm function was demonstrated during a SCRAM experienced on January 10, 1981.

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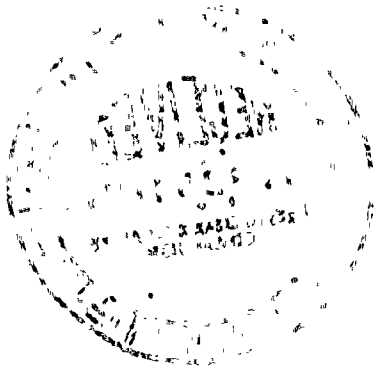

Item No. 3 - Interim Manual Surveillance

In the interim period before the operability test was completed, the manual surveillance for the presence of water was performed once per shift. In order to provide assurance that manual surveillance can detect water accumulation in the SDV, it was verified that the method and the operator have been qualified by testing which simulates the SDV piping and has the ability to detect different levels of water in the SDV.

Item No. 4 - Full Test of CMS to be Conducted During a Planned Outage

During the next refueling outage, which will begin in March 1981, a full CMS test will be performed as required.

Item No. 5 - Operability of CMS During Reactor Operations

Compliance with operability requirements as described in the first two paragraphs of this item is recognized. These stipulations are being established as standing orders to Operations personnel.

A periodic Surveillance Test has been established for operability of the CMS. Presently this is a quarterly test with the first performed on December 13, 1980. Criteria for repair or replacement is established as set forth by the Surveillance Test Procedure and vendor information. This Surveillance Test includes the criteria (a), (b) and (c) described in this item.

The Operability and Calibration Tests will be performed periodically as future system developments dictate.

Item #6 - Operating Procedures

Provisions have been made for operation, periodic testing, calibration and repair procedures as described in this item. This applies to both the hand held and CMS UT monitoring devices.

Cordially,

Thomas E. Lempges

Thomas E. Lempges
Vice President - Nuclear Generation

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