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SUBJECT: Amends commitment to install tamper seals on instrumentation valves after calibr per LER 83-32.On 831017, inspector found 3/4-inch test valve open to torus water level instrument.Correct valve position will be maintained.

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Joseph F. Firlit
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NMP80508

June 21 , 1991

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Docket No. 50-220

Gentlemen:

The purpose of this letter is to amend a commitment made by the corrective actions of LER 83-32. Specifically, to remove the commitment of installing tamper seals on instrumentation valves after calibration. At that time this LER was submitted in accordance with Section 6.9.2(a)6 of Nine Mile Point Unit 1 Technical Specifications, personnel error or procedural inadequacy which prevents or could prevent by itself the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the FSAR.

Based on discussion with the USNRC Resident Inspector and due to LER 83-32 being in the NUREG-0161 format, a supplement to the LER would be inappropriate. Therefore, this matter is being submitted in letter form for your information.

The event description of the LER explains that on 10/17/83 the USNRC Resident Inspector found a 3/4" test valve to be open to Torus Water Level Instrument 58-04. This allowed free communication between the Torus and the secondary containment atmosphere through penetration XS-348, the torus wide range water level transmitter root valve, the open test valve, and a 1/2" tygon sight tube approximately 22.4 ft. long connected to the test valve.

The LER stated that although the actual cause of the event could not be determined, it may have been caused by improper return to service of the test equipment following the last performance of the surveillance procedure. In today's environment the cause would be categorized as personnel error. The corrective actions taken to prevent this from occurring in the future were changing the surveillance procedure to require the valve be wire sealed closed, adding steps to remove the test equipment, and install a pipe cap following the performance of the surveillance. In addition, instrument 58-04 was added to the Pre-Startup Valve Line-Up Check Procedure.



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The use of tamper seals can make it impossible to verify whether a valve is fully open or fully closed. This could result in an event similar to the one described in INPO SOER 90-3, which describes an event where a feedwater equalizing valve not being fully closed caused erroneous feedwater signals. These erroneous signals had resulted in incorrect heat balance calculations and incorrect nuclear instrumentation gain settings.

The use of tamper seals on instrument valves can prevent proper verification. Also, tamper seals do not prevent someone from mispositioning a valve, and are an additional source of radwaste.

A telephone poll of several plants and a poll at the I&C 7/9/90 BWROG meeting in Denver, Colorado has indicated that very few plants still use tamper seals on I&C related valves. This indicates that it is no longer common industry practice to use tamper seals. Niagara Mohawk Engineering was also consulted to determine if any commitments have been made requiring the use of tamper seals. Their investigation provided only one situation which required the use of tamper seals. This was the corrective action in response to the above mentioned LER.

Based on the above, we are amending LER 83-32 to not require the use of tamper seals. Correct valve position will be maintained through verifications in return to service sections of procedures, valve line-up procedures, and mark-up procedures. In addition, errors of this type would result in accountability meetings, ultimately holding people accountable for their actions.

Very truly yours,

Joseph F. Firlit
Vice President - Nuclear Generation

JFF/MC/lmc

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