NRC FORM 366
(7-77)

U. S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

CONTROL BLOCK: | | | | | | | (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

0	1	F L S L S 1 (2)	0 0 - 0 0 0 0 0 - 0 0 (3)	4 1 1 1 1 (4)	(5)
7 8		9 LICENSEE CODE 14	15 LICENSE NUMBER 25	26 LICENSE TYPE 30	57 CAT 58

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0 1	REPORT SOURCE L (6)	0 5 0 0 0 3 3 5 (7)	0 9 2 1 7 9 (8)	1 0 0 5 7 9 (9)
7 8	60 61	DOCKET NUMBER 68	69 EVENT DATE 74	75 REPORT DATE 80

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

0 2 During an evaluation of steam generator (S/G) level sensing instrumenta-
0 3 tion, conducted as a part of compliance with NRC I & E Bulletin 79-21,
0 4 it was noted that the design specifications of the S/G had been used
0 5 by the NSSS vendor to establish the instrument span for measuring S/G
0 6 level when the as-built dimensions should have been used. This resulted
0 7 in a non-conservative error of approximately 2% (or 4 inches) in the S/G
0 8 low-level trip set point.

0 9	SYSTEM CODE	CAUSE CODE	CAUSE SUBCODE	COMPONENT CODE	COMP. SUBCODE	VALVE SUBCODE
	I A (11)	B (12)	A (13)	Z Z Z Z Z Z (14)	Z (15)	Z (16)

(17) LER/RO REPORT NUMBER

EVENT YEAR		SEQUENTIAL REPORT NO.		OCCURRENCE CODE	REPORT TYPE		REVISION NO.
7 9	—	0 3 0	/	0 1	T	—	0

ACTION TAKEN	FUTURE ACTION	EFFECT ON PLANT	SHUTDOWN METHOD	HOURS (22)	ATTACHMENT SUBMITTED	NPRD-4 FORM SUB.	PRIME COMP. SUPPLIER	COMPONENT MANUFACTURER
E (18)	Z (19)	Z (20)	Z (21)	0 0 0 0	Y (23)	N (24)	N (25)	C 4 9 0 (26)

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

1 0 Use of design specifications instead of as-built dimensions to establish
1 1 the S/G level sensing instrument span resulted in a 2% non-conservative
1 2 error in the S/G low level trip set point. After confirmation of the
1 3 plant staff's evaluation by the NSSS vendor, the reactor protective system
1 4 S/G low level trip setpoint was raised to 39%.

1 5	FACILITY STATUS	% POWER	OTHER STATUS (30)	METHOD OF DISCOVERY	DISCOVERY DESCRIPTION (32)
	E (28)	1 0 0 (29)	NA	A (31)	Plant Staff Evaluation

1 6	ACTIVITY RELEASED	CONTENT OF RELEASE	AMOUNT OF ACTIVITY (35)	LOCATION OF RELEASE (36)
	Z (33)	Z (34)	NA	NA

PERSONNEL EXPOSURES

1 7	NUMBER	TYPE	DESCRIPTION (39)
	0 0 0 (37)	Z (38)	NA

PERSONNEL INJURIES

1 8	NUMBER	DESCRIPTION (41)
	0 0 0 (40)	NA

LOSS OF OR DAMAGE TO FACILITY (43)

1 9	TYPE	DESCRIPTION
	Z (42)	NA

PUBLICITY

2 0	ISSUED	DESCRIPTION (45)	NRC USE ONLY
	N (44)	NA	

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ADDITIONAL EVENT DESCRIPTION AND PROBABLE CONSEQUENCES

During an evaluation of steam generator level sensing instrumentation conducted as part of compliance with NRC I & E Bulletin 79-21, it was noted that the design specifications of the steam generator had been used by the NSSS vendor to establish the instrument span for measuring steam generator level. In actuality, the as-built dimensions should have been employed for this determination.

The FSAR analysis assumes a reactor trip during a loss of feedwater accident to occur when steam generator water level drops 50 inches below the normal water level. As a result of using the design (instead of as-built) steam generator dimensions, the low level trip setpoint of 37% is in error (non-conservative) by approximately 2% (4 inches) in comparison with the FSAR criteria. The FSAR analysis does, however, also assume an instrument error of 10 inches in analyzing the loss of feedwater accident.

Confirmation was received from the NSSS vendor that past operation with the setpoint error did not have an effect on the safety analysis and did not affect the health and safety of the public. This was the first occurrence of this type.

ADDITIONAL CAUSE DESCRIPTION AND CORRECTIVE ACTION

Use of wrong dimensions in establishing the steam generator level sensing instrument span resulted in a 2% error in the steam generator low level trip setpoint.

Immediate corrective action was to instruct the control center operators that, in the event of a low steam generator level condition, the reactor was to be manually tripped upon reaching 39% level. After receipt of NSSS confirmation of the plant staff's evaluation of the proper instrument span, the Reactor Protective System steam generator low level trip setpoint was raised to 39%.