

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 22, 1995

50-407

Mr. W. R. Robinson, Vice President Shearon Harris Nuclear Power Plant Carolina Power & Light Company Post Office Box 165 - Mail Code: Zone 1 New Hill, North Carolina 27562-0165

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE PROPOSED TECHNICAL SPECIFICATIONS CHANGE ELIMINATING PRESSURE SENSOR RESPONSE TIME TESTING REQUIREMENTS - SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1 (TAC NO. M91722)

Dear Mr. Robinson:

By letter dated March 3, 1995, Carolina Power & Light Company (CP&L) proposed the elimination of periodic response time testing (RTT) Technical Specification requirements for selected pressure and differential pressure sensors in certain Reactor Trip System and Engineered Safety Features Actuation System instrumentation channels for Shearon Harris Nuclear Power Plant, Unit 1 (SHNPP).

In the proposed change request, CP&L stated that the technical justification for the elimination of sensor RTT is contained in Westinghouse Electric Corporation report WCAP-13632, Revision 1, "Elimination of Pressure Sensor Response Time Testing Requirements," dated December 1993. In August 1995, Westinghouse Electric Corporation issued WCAP-13632, Revision 2, which superseded Revision 1. By Safety Evaluation Report (SER) dated September 5, 1995, the staff approved WCAP-13632, Revision 2, as a basis for eliminating RTT requirements for selected pressure and differential pressure sensors. This generic SER listed several actions that licensees must take when eliminating RTT requirements.

In order to facilitate the staff review of the CP&L's March 3, 1995, submittal, you are requested to review information relating to the conditions specified in the staff's generic SER and provide additional information as provided in Enclosure 1. The staff's generic SER approving WCAP-13632, Revision 2, is provided as Enclosure 2.

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This requirement affects nine or fewer respondents and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely

(Original Signed By)

Ngoc B. Le, Project Manager Project Directorate II-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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Mr. W. R. Robinson Carolina Power & Light Company

cc:

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Mr. Henry Dunlap, Chairman Board of County Commissioners of Chatham County P. O. Box. 111 Pittsboro, North Carolina 27312 · · · ·

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ENCLOSURE 1

REQUEST FOR ADDITIONAL INFORMATION

(1) In August 1995, Westinghouse Electric Corporation issued WCAP-13632; Revision 2, which superseded WCAP-13632, Revision 1. Subsequently, by Safety Evaluation Report (SER) dated September 5, 1995 (Enclosure 2), the staff approved WCAP-13632, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements," as a basis for eliminating RTT requirements for selected pressure and differential pressure sensors. Please revise your March 3, 1993 submittal to reference WCAP-13632, Revision 2.

- (2) The staff's SER approving WCAP-13632, Revision 2, stated that licensees must take the following actions when eliminating pressure and differential pressure sensor RTT requirements:
 - (a) Perform a hydraulic RTT prior to installation of a new transmitter/switch or following refurbishment of the
 - ' '''' transmitter/switch (e.g., sensor cell or variable damping components) to determine an initial sensor-specific response time value.
 - (b) For transmitters and switches that use capillary tubes, perform an RTT after initial installation and after any maintenance or modification activity that could damage the capillary tubes.
 - (c) If variable damping is used, implement a method to assure that the potentiometer is at the required setting and cannot be inadvertently changed or perform hydraulic RTT of the sensor following each calibration.

Please address each of these actions and state how these actions will be implemented.

(3) The staff's SER approving WCAP-13632, Revision 2, noted that loss of fill-oil in pre-July 1989 and post-July 1989 manufactured Model 1151, 1152, 1153, and 1154 Rosemount pressure and differential pressure transmitters is a credible failure mode that could potentially affect sensor response time independently of sensor output. As a result, this failure mode may not be detected during other routine surveillance requirements. To address this potential failure mode, the staff's SER stated that licensees proposing to eliminate RTT requirements for all Model 1151, 1152, 1153, and 1154 Rosemount pressure and differential pressure transmitters must take the following action:

"Perform periodic drift monitoring of all Model 1151, 1152, 1153, and 1154 Rosemount pressure and differential pressure transmitters, for which RTT elimination is proposed, in accordance with the guidance contained in Rosemount Technical Bulletin No. 4 and continue to remain in full compliance with any prior commitments to Bulletin 90-01, Supplement 1, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount." As an alternative to performing periodic drift monitoring of Rosemount transmitters, licensees may complete the following actions: (1) ensure that operators and technicians are aware of the Rosemount transmitter loss of fill-oil issue and make provisions to ensure that technicians monitor for sensor response time degradation during the performance of calibrations and functional tests of these transmitters, and (2) review and revise surveillance testing procedures, if necessary, to ensure that calibrations are being performed using equipment designed to provide a step function or fast ramp in the process variable and that calibrations and functional tests are being performed in a manner that allows simultaneous monitoring of both the input and output response of the transmitter under test, thus allowing, with reasonable assurance, the recognition of significant response time degradation."

In the March 3, 1995 letter, CP&L proposed to eliminate RTT requirements for Model 1153 and 1154 Rosemount transmitters installed in the pressurizer pressure, reactor coolant flow, and refueling water storage tank level instrumentation channels. Please address the above action and state how the action will be implemented. Please include any information relating to prior Bulletin 90-01, Supplement 1, commitments for these transmitters.

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