

LICENSEE EVENT REPORT

CONTROL BLOCK:

(PLEASE PRINT OR TYPE ABOVE REQUIRED INFORMATION)

01	N	Y	N	M	P	1	2	0	0	-	0	0	0	0	0	0	0	0	3	4	1	1	1	1	4	5
7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33
LICENSEE CODE						LICENSE NUMBER						LICENSE TYPE						CAT 58								

01	L	6	0	5	0	0	0	2	2	0	7	0	2	0	3	8	0	8	0	2	1	5	8	0	9
7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
CON'T			DOCKET NUMBER						EVENT DATE						REPORT DATE										

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

02 | An Engineering evaluation of GE SIL 299 required that Lo Lo Lo Setpoint

03 | for reactor core water level be raised 20 inches. The evaluation

04 | indicated that for a majority of accident scenarios system design

05 | did not preclude Lo Lo Lo water level actuation for small steam and

06 | water breaks. However, conservative evaluation indicated that piping

07 | configuration for the Lo Lo Lo level instrumentation may preclude the

08 | setpoint from being reached during a LOCA.

09	I	B	11	B	12	A	13	Z	Z	Z	Z	Z	Z	14	Z	15	Z	16
7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
SYSTEM CODE			CAUSE CODE			CAUSE SUBCODE			COMPONENT CODE						COMP. SUBCODE		VALVE SUBCODE	
17	8	0	—	0	0	5	—	0	1	X	—	—	—					
LER/RO REPORT NUMBER			EVENT YEAR		SEQUENTIAL REPORT NO.			OCCURRENCE CODE		REPORT TYPE		REVISION NO.						
18	X	19	Z	20	Z	21	0	0	0	0	0	0	0					
ACTION TAKEN		FUTURE ACTION		EFFECT ON PLANT		SHUTDOWN METHOD		HOURS		ATTACHMENT SUBMITTED		NPRD-4 FORM SUB.		PRIME COMP. SUPPLIER		COMPONENT MANUFACTURER		

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

10 | The setpoint change was required as a result of an engineering

11 | evaluation of GE SIL 299. Engineering efforts to more precisely

12 | measure actual to indicated water level difference due to heat up

13 | revealed that the Lo Lo Lo setpoint may not be reached during a

14 | LOCA if the indicated to actual level difference was large.

15	E	28	0	9	5	29	NA	30	D	31	notified by Engineering	32		
7	8	9	10	11	12	13	14	15	16	17	18	19		
FACILITY STATUS			% POWER			OTHER STATUS			METHOD OF DISCOVERY				DISCOVERY DESCRIPTION	

16	Z	33	Z	34	NA	35	NA	36	
7	8	9	10	11	12	13	14	15	
ACTIVITY RELEASED			CONTENT OF RELEASE			AMOUNT OF ACTIVITY		LOCATION OF RELEASE	

17	0	0	0	37	Z	38	NA	39
7	8	9	10	11	12	13	14	15
PERSONNEL EXPOSURES NUMBER			TYPE		DESCRIPTION			

18	0	0	0	40	NA	41
7	8	9	10	11	12	13
PERSONNEL INJURIES NUMBER			DESCRIPTION			

19	Z	47	NA	43
7	8	9	10	11
LOSS OF OR DAMAGE TO FACILITY TYPE			DESCRIPTION	

20	N	44	NA	45
7	8	9	10	11
PUBLCITY ISSUED DESCRIPTION				

8002250 604

GPO 817-218



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February 15, 1980

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

Re: Docket No. 50-220
 LER 80-05

Dear Mr. Grier:

The GE SIL 299 outlining the possible errors in water level instrumentation indication was received on July 30, 1979. A Part 21 evaluation was initiated to determine the implications of the difference in actual to indicated water level on the projected PCT's during postulated LOCA's. Results of these preliminary conservative calculations indicated that PCT's would not be significantly affected (i.e., $\Delta PCT < 20^\circ F$). These results appeared consistent with that which would be expected since during the accident, initiation is relatively fast and water level instrumentation heatup with the associated inaccuracy is slow. Since the calculations indicated no significant problem existed, formal write-up, analysis and concurrence was completed on a low priority basis on October 14, 1979. No further action was required.

As a result of the long term TMI modifications, NM Engineering was in the process of developing improved core water level monitoring capabilities. As a result of this engineering effort and to more precisely measure the actual to indicated water level difference due to heat up, ~~it was discovered that, due to the design of the current system, indicated LLL may not be reached if the indicated to actual water level difference was large during a postulated LOCA.~~

An analysis was initiated to determine the effect of the instrumentation heatup outlined in GE SIL 299 on PCT's including the newly discovered geometric configuration problems. These analyses indicated that for a majority of accident scenarios; system design did not preclude LLL water level initiation. However, for small steam and water breaks,



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Mr. Boyce Grier
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conservative evaluation of available data indicated that the design of the LLL water level indication instrumentation may preclude this setpoint from being reached. More detailed analysis of drywell temperature, reactor water level and pressure may show LLL level indication would initiate or that it may not be required due to normal reactor pressure decreases. However, based on available data it was concluded that a recalibration of the LLL setpoint was required. These analyses were completed on February 1, 1980.

Very truly yours,

James Bartlett
James Bartlett
Executive Vice President

JL/

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