

LICENSEE EVENT REPORT

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

LICENSEE CODE: M A Y K R 1 LICENSE NUMBER: 200-000000-000 LICENSE TYPE: 411111 CAT 58

REPORT SOURCE: L DOCKET NUMBER: 05000029 EVENT DATE: 710128 REPORT DATE: 812058

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES: During a maintenance outage while performing a recalibration of steam generator No. 2 Narrow Range Level Trip System, Procedure OP-4605, following modification to the transmitter sensing line configuration, the low level scram setpoints were found to operate below Technical Specification limits by 1.5 and 1.3 inches. This was identified as a violation of Technical Specification Table 2.2-1, Item 11 and reported as LER 80-17/03L. Subsequent investigation revealed the wording in this LER to be ambiguous.

SYSTEM CODE: IA CAUSE CODE: X CAUSE SUBCODE: Z COMPONENT CODE: INSTRU COMP. SUBCODE: T VALVE SUBCODE: Z LER/RO REPORT NUMBER: 17 EVENT YEAR: 80 SEQUENTIAL REPORT NO.: 017 OCCURRENCE CODE: 03 REPORT TYPE: X REVISION NO.: 0 ACTION TAKEN: EZ EFFECT ON PLANT: Z SHUTDOWN METHOD: Z HOURS: 0000 ATTACHMENT SUBMITTED: Y NPRD-4 FORM SUB.: N PRIME COMP. SUPPLIER: L COMPONENT MANUFACTURER: F120

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS: During the ten years of operation of this system only one previous event of this nature has occurred and was reported as LER 77-40. During this 10-year period it has been difficult and time consuming to properly vent these transmitters prior to calibration due to their sensing line configuration. A design change was developed and approved to alleviate this condition.

FACILITY STATUS: G % POWER: 0000 OTHER STATUS: Maint. Outage METHOD OF DISCOVERY: B DISCOVERY DESCRIPTION: Retest After Modification ACTIVITY CONTENT RELEASED: Z AMOUNT OF ACTIVITY: N/A LOCATION OF RELEASE: N/A PERSONNEL EXPOSURES: 000 TYPE: Z DESCRIPTION: N/A PERSONNEL INJURIES: 000 DESCRIPTION: N/A LOSS OF OR DAMAGE TO FACILITY: Z DESCRIPTION: N/A PUBLICITY ISSUED: Z DESCRIPTION: 8012090293 N/A

EVENT DESCRIPTION (Continued)

us and this report is submitted to clarify this ambiguity as LER 80-17/03X, Supplemental. There were no adverse effects upon the public health and safety.

CAUSE DESCRIPTION(Continued)

calibration difficulty. During the 1980 maintenance outage this modification was implemented on the four steam generator narrow range level transmitters. Following modification to the narrow range steam generator level transmitter sensing lines, the system was satisfactorily hydrostatic tested and recalibrated. The modification was found to be very effective for proper venting. While taking the as-found data for the calibration it was determined that the low level scram setpoints were out of specification as identified above. An evaluation of the cause was initiated and many causes which collectively could have lead to the out of specification setpoints were found. Those were: During the outage a modification to the steam generator seismic supports was completed on each steam generator entailing removing lagging, installing staging, installing sheet shielding, installing seismic snubbers, removing shielding, installing lagging and removing staging. All of these events occurred in the immediate area of the steam generator level transmitters. Qualified terminal blocks were installed in the transmitter circuit. A substantial modification to the transmitter sensing line was performed and subsequently a hydrostatic test was performed on the instruments and sensing lines. It is our conclusion that these conditions were the sole cause for the out of specification setpoints and the original LER should not have been submitted. A follow-up investigation was conducted to determine if other safety related function transmitters existed with similar sensing line configuration difficulties. None were found.