Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 5, 1993

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Response to NRC Bulletin 90-01 Supplement 1, dated December 22, 1992.

Braidwood Units 1 and 2,
(NRC Docket Numbers 50-456 and 50-457)

Reference: NRC Bulletin 90-01 Supplement 1, "Loss of Fill Oil in Transmitters Manufactured by Rosemount," dated December 22, 1992.

Dear Dr. Murley:

The purpose of this letter is to provide the Braidwood Station response to the requested actions of Bulletin 90-01 Supplement 1. The details of the Braidwood response are contained in Attachment 1 and a tabular summary is provided in Attachment 2.

Braidwood has a total of forty-two (42) transmitters within the scope of the referenced Bulletin; however, no enhanced monitoring more frequently than a refueling cycle will be required. This determination is based on transmitter maturity, operating pressure and Bulletin categorization.

Consistent with the Bulletin's reporting requirements, Braidwood Station has reviewed the requested actions and agrees to comply with all applicable actions. Specifically, Braidwood will:

maintain an enhanced surveillance program, at a refueling outage frequency, for the eight (8) transmitters in Bulletin category 1.c until the transmitters reach maturity.

This action satisfies completely the recommendations of the Supplement and no additional actions or justifications are required.

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To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other Commonwealth Edison employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

If there are any questions or comments, please contact me.

Sincerely,

David J. Chrzanowski
Generic Issues Administrator
Nuclear Regulatory Services

Attachments: Attachment 1 - Response to NRCB 90-01 S1 Actions
Attachment 2 - Tabular Summary of Transmitter Status

cc: Regional Administrator-RIII
Braidwood Project Manager-NRR/PDIII-2
S. DuPont, Senior Resident Inspector (Braidwood)

State of Ill. County of Cook
Signed before me on this 5th day
of March, 19 93 by DJC
Notary Public

"OFFICIAL SEAL"
SANDRA A. LEHNA
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 6/25/94

ZNLD/2521/2

Attachment 1

Braidwood Station Response to NRCB 90-01 SI Requested Actions

Requested Actions

1. Review Plant records and identify any Rosemount Model 1153 Series B, Model 1153 Series D, and model 1154 transmitters manufactured before July 11, 1989, that are used or may be used in the future in either safety-related systems or systems installed in accordance with 10 CFR 50.62 (the ATWS rule), and

Braidwood Station has completed this review and has determined that a total forty-two (42) Rosemount transmitters are installed in the described systems.

a. Expeditiously replace, or monitor for the life of the transmitter on a monthly basis using an enhanced surveillance monitoring program, any transmitters that have a normal operating pressure greater than 1500 psi and that are installed in reactor protection trip systems, ESF actuation systems or ATWS systems.

Action for those transmitters that have not met the Rosemount psi-month threshold criterion should be expedited.

Braidwood Station does not have any transmitters in this category.

At their discretion, licensees may monitor using an enhanced surveillance program at least once every refueling cycle, but not exceeding 24 months, transmitters in this category if the appropriate psi-month threshold criterion recommended by Rosemount has been reached, and the monitoring interval is justified based upon transmitter performance in service and its specific safety function.

Braidwood Station does not have any transmitters in this category.

b. Replace, or monitor for the life of the transmitter on a quarterly basis using an enhanced surveillance monitoring program, any transmitters that have a normal operating pressure greater than 1500 psi and that are used in safety-related applications but are not installed in reactor protection trip systems, ESF actuation systems, or ATWS systems.

Braidwood Station does not have any transmitters in this category.

At their discretion, licensees may monitor using an enhanced surveillance program at least once every refueling cycle, but not exceeding 24 months, transmitters in this category if the appropriate psi-month threshold criterion recommended by Rosemount has been reached, and the monitoring interval is justified based upon transmitter performance in service and its specific function.

Braidwood Station does not have any transmitters in this category.

c. [For BWRs] Replace, or monitor on a monthly basis using an enhanced surveillance monitoring program, until the transmitter reaches the appropriate psi-month threshold criterion recommended by Rosemount, any transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi, that are installed in reactor protection trip systems, ESF actuation systems or ATWS systems.

The BWR requirements are not applicable to Braidwood Station.

On a case-by-case basis except for transmitters that initiate reactor protection or ATWS trips for high pressure or low water level, licensees may monitor using an enhanced surveillance program at least once every refueling cycle, but not exceeding 24 months, if sufficient justification is provided based upon transmitter performance in service and its specific safety function.

The BWR requirements are not applicable to Braidwood Station.

[For PWRs] Replace, or monitor at least once every refueling cycle, but not exceeding 24 months, using an enhanced surveillance program until the transmitter reaches the appropriate psi-month threshold criterion recommended by Rosemount, any transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi and that are installed in reactor protection trip systems, ESF actuation systems, or ATWS systems.

Braidwood Station has eight (8) non-mature transmitters in this category.

d. Replace, or monitor at least once every refueling cycle, but not exceeding 24 months, using an enhanced surveillance monitoring program until the transmitter reaches the appropriate psi-month threshold criterion recommended by Rosemount, any transmitters used in safety-related systems that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi, and that are not installed in reactor protection trip systems, ESF actuation systems, or ATWS systems.

Braidwood does not have any transmitters in this category.

e. At licensee discretion, exclude from the enhanced surveillance program any transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi that have reached the appropriate psi-month threshold criterion recommended by Rosemount (60,000 psi-months or 130,000 psi-months depending on the range code of the transmitter).

A high degree of confidence should be maintained for detecting failure of these transmitters caused by a loss of fill-oil and a high degree of reliability should be maintained for the function consistent with its safety significance.

Braidwood does not have any transmitters in this category.

f. At licensee discretion, exclude from the enhanced surveillance program any transmitters that have a normal operating pressure less than or equal to 500 psi. A high degree of confidence should be maintained for detecting failure of these transmitters caused by a loss of fill-oil and a high degree of reliability should be maintained for the function consistent with its safety significance.

Braidwood has thirty-four (34) transmitters in this category. The Braidwood program will maintain confidence that failures can be detected.

2. Evaluate the enhanced surveillance monitoring program to ensure that the program provides measurement data with an accuracy range consistent with that needed for comparison with manufacturer drift data criteria for determining degradation caused by a loss of fill-oil.

Braidwood Station has an enhanced surveillance program that monitors, with required accuracy, the parameters indicative of a loss of fill oil condition.

Attachment 2

Summary of Transmitter Status for Braidwood Station

Bulletin Category	Transmitter Pressure/Function	Maturity	Frequency of Enhanced Surveillance	Discussion/Comments
1.a	Normal Operating Pressure >1500 psi and transmitter is installed in RPS,ESF or ATWS systems	Not Mature, < 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
		Mature, > 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
1.b	Normal Operating Pressure >1500 psi. Transmitter is safety related but is not installed in RPS, ESF or ATWS systems	Not Mature, < 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
		Mature, > 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
1.c (BWR)	Operating pressure from 500 to 1500 psi and transmitter is in RPS, ESF or ATWS systems	Not Mature, < 60,000 psi*months	N/A	Not applicable to Braidwood Station
			N/A	Not applicable to Braidwood Station
		Mature, > 60,000 psi*months	N/A	Not applicable to Braidwood Station
1.c (PWR)	Operating pressure from 500 to 1500 psi and transmitter is in RPS, ESF or ATWS systems	Not Mature, < 60,000 psi*months	Refueling Outage	Braidwood has 8 transmitters in this category
		Mature, > 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
1.d	Operating pressure from 500 to 1500 psi and transmitter is not in RPS, ESF or ATWS systems but is safety related	Not Mature, < 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
1.e	Operating pressure from 500 to 1500 psi	Mature, > 60,000 psi*months	N/A	Braidwood does not have any transmitters in this category
1.f	Operating pressure less than or equal to 500 psi	N/A	Exempt	Braidwood has 34 transmitters[1] in this category
2	Braidwood Station has an enhanc_ surveillance monitoring program that provides measurement data with an accuracy range consistent for determining degradation caused by loss of fill oil.			

[1] Sixteen of these 34 transmitters are Auxiliary Feed System transmitters that normally operate at <100 psi. Per the Rosemount Technical Bulletin these transmitters are considered "Standby" and are exempt from enhanced surveillance.