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United States Nuclear Regulatory Commission
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Subject: Supplemental Response to NRC Bulletin Number 90-01, Supplement 1, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount"

Gentlemen:

By letter dated March 5, 1993 (Serial Number 1-1005), Toledo Edison (TE) provided its response to NRC Bulletin 90-01, Supplement 1, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount." Since the submittal of TE's response, telephone conversations between the NRC staff and the TE staff were conducted on September 24, 1993, and March 9, 1994 to discuss the information provided by TE. Attachment 1 provides TE's responses to the issues raised during the aforementioned discussions.

Should you have any questions concerning this information, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,

Donald C. Shelton

NKP/eld

cc: J. B. Martin, Regional Administrator, NRC Region III
S. Stasek, DB-1 NRC Senior Resident Inspector
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Operating Companies:
Cleveland Electric Illuminating
Toledo Edison

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Response to Request for Additional Information
on NRC Bulletin 90-01, Supplement 1

Item 1

In Attachment 1 to Serial Number 1-1005, Page 1, Action 1.a., TE stated that transmitter PT6365A will be replaced during the current refueling outage (8RFO) with a new range code 9 transmitter and subsequently will not be subject to the requirements of NRC Bulletin 90-01, Supplement 1.

Was this transmitter replaced?

TE Response to Item 1

PT6365A, Reactor Coolant System (RCS) extended range pressure transmitter was replaced during the Eighth Refueling Outage (8RFO) on March 18, 1993 with a new range code 9 transmitter (Model 1154GP9, Serial Number 503820) per Maintenance Work Order (MWO) 3-93-4833-01. Since the new transmitter was manufactured after July 11, 1989 it is not subject to the requirements of NRC Bulletin 90-01, Supplement 1.

Item 2

In the Reporting Requirements section of NRC Bulletin 90-01, Supplement 1, the NRC requested that TE provide a statement confirming that Items 1 and 2 of the Requested Actions for Operating Reactors in NRC Bulletin 90-01, Supplement 1 have been completed.

In Attachment 1 of Serial Number 1-1005, Page 5, TE stated that Davis-Besse will complete licensee actions required to meet Requested Actions 1 and 2 by the completion of 8RFO.

Have these actions been completed?

TE Response to Item 2

TE completed the actions required to meet NRC Bulletin 90-01, Supplement 1, Actions 1 & 2 during 8RFO as the replacement of PT6365A was the only outstanding item identified in the response to the NRC Bulletin Supplement.

Item 3

In Attachment 1 to Serial Number 1-1005, Page 2, Action 1.b., TE stated that transmitters LT5448B, LTRC14-1 and LTRC14-3 have exceeded the psi-month threshold (>130K psi-months). Transmitters LTRC14-1 and LTRC14-3 measure pressurizer level and provide indications, alarms, interlocks, and level control input to normal make-up line flow control valve MU-32. These transmitters are redundant and either of the two can be selected to provide the alarm and control functions in the event one fails. Transmitter LT5448B provides Post Accident Monitoring indication of reactor coolant system inventory. TE will establish a once per refueling cycle enhanced surveillance program (ESP) interval for these transmitters due to demonstrated satisfactory performance as trended since the original NRC Bulletin Number 90-01. Transmitter FTMU31, make-up flow transmitter (wide range), uses the same flow element but is not truly redundant to FTMU34 which is calibrated for narrow range indication. However, a once per refueling cycle ESP interval will be established for FTMU31 as it has exceeded the psi-month threshold and a failure will not adversely affect operability of the make-up system.

How does TE define satisfactory performance?

TE Response to Item 3

TE considers transmitters to be performing satisfactorily based upon an evaluation of the following:

(1) As found data from transmitter calibrations compared to previous as left data.

(2) Observed drift compared to that given in Rosemount Technical Bulletin No. 4.

(3) Trending program (using computer points) for transmitter performance.

(4) During transmitter calibrations, technicians specifically look for sluggish or abnormal transmitter performance.

FTMU31 was installed on November 12, 1988 and presently has 175,000 psi-months of operation (i.e., 70 months with an operating pressure of 2500 psi). Although FTMU31 (Model 1154HP6, Serial Number 415081) was manufactured prior to July 11, 1989, it has exceeded the psi-month threshold (> 60K psi-months). As stated in the previous response (Serial Number 1-1005), the performance of FTMU31 has been satisfactory using the guidelines described above. FTMU31 will continue to be calibrated at an 18 month interval (i.e., once per refueling cycle).