## NORTHEAST UTILITIES



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July 1, 1991

Docket No. 50-336 A09558

Mr. Charles V. Hehl, Director Division of Reactor Proteins U. S. Nuclear Regulation Commission Region I 475 Allendale Road King of Prussia, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2 RI-91-A-0049

We have completed our review of identified issues concerning activities at Millstone Unit No. 2 (RI-91-A-0049). As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response. Based upon our request on June 25, 1991 with Region I personnel, a four-day extension to this letter was granted to allow for routine and proper administrative processing.

## Issue:

Foxboro "smart" or "intelligent" transmitters were installed approximately one fuel cycle ago to be utilized during the calibration of feedwater flow transmitters PT-5269A, PT-5269B and charging flow transmitter PT-212. The use of these "smart" transmitters is not in the controlling calibration procedures, IC-2426B for feed flow and IC-2429A for charging flow. The controlling modification work (PDCE/PDCR) did not address the need for the calibration procedure changes. In addition, training on the "smart" transmitter was limited to a Foxboro vendor representative presentation to the I&C technicians.

Please discuss the validity of the above assertions. Please discuss actions taken to determine whether the above mentioned flow transmitters have been properly calibrated subsequent to the installation and use of the Foxboro "smart" transmitters.

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## Background:

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Two "intelligent" replacement transmitters have been installed in the feedwater flow application. The transmitters are one-for-one replacements that did not require any plant modification for installation in this application.

The calibration method detailed in the procedure is the same for both intelligent and analog transmitters. The need for procedure changes at the time of the replacement was reviewed and determined to not be necessary.

After the second replacement, an Instrument & Control (I&C) Specialist requested that additional training on this type of transuitter be conducted. The vendor of the transmitter provided an overview of the transmitter operation. The Technical Training Department was requested to provide more detailed training on hardware and software used during the calibration activity. This training is tentatively scheduled for the first quarter of 1992.

This issue was documented in NRC Resident Inspection Report 91-04 Section 5.3.2.

## Response:

The performance of the new transmitters has been reviewed and determined to be acceptable. The "as left" calibration data document the results and acceptability of the calibration activity. The calibration methods are similar. It is considered within the skill level of the I&C technicians who are trained in the calibration of similar transmitters. In fact, there have been no identified errors related to this calibration activity. However, the additional training will further enhance the skill level and proficiency of the I&C technician performing the calibration tasks.

After our review and evaluation, we find that this issue does not present any indication of a compromise to nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Maryha Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3 E. C. Venzinger, Chief, Projects Branch No. 4, Division of Reactor Projects