



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNOVALL, JR.
VICE PRESIDENT
SUPPLY

March 8, 1984

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. R. W. Starostecki, Director
Division of Project & Resident
Programs

Gentlemen:

This refers to Inspection Report 50-317/83-31, 50-318/83-31; which transmitted two items of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to those items noted in your letter of February 7, 1984.

Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,

AEL/LOW/gla

Enclosure

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION REPORT 50-317/83-31; 50-318/83-31

ITEM A.1

A violation was identified involving failure to maintain adequate room ventilation for the Auxiliary Feedwater (AFW) System during modes when the system is required to be operable. The following action has been taken to ensure that similar violations will not recur in the future:

Plant log sheets have been revised to include a reading for AFW Pump Room air temperature. These readings are required to be logged once every four hours during modes requiring an operable AFW system. Senior Control Room personnel review logged parameters on a daily basis to survey the condition of plant equipment. We feel that this practice is sufficient to identify future degradation of the AFW Pump Room ventilation system. This action was completed on February 11, 1984.

The following action will be taken to ensure that cooling is available for the AFW pump bearings in the event that the normal ventilation system fails during modes requiring operability of the AFW system:

The normal Operating Instruction for the AFW system, (OI-32) and appropriate Emergency Operating Procedures will be revised adding a precautionary note alerting the Operator of the need to maintain adequate room cooling during AFW pump operations. It will also refer the Operator to existing written procedures in OI-32 for restoring ventilation in the event of a loss of the normal system. This action will be completed by no later than May 25, 1984.

ITEM A.2

A violation was identified involving failure to maintain the Pressurizer pressure safety channels within required limits of accuracy (a problem previously identified due to environmentally induced temperature drift and hysteresis associated with installed Barton transmitters) in modes requiring operability of the instrumentation.

Upon reviewing the concerns expressed by the Resident Inspector in the Inspection Report, we have determined that incorporating some changes to the trending program (as described on page 8 of I&E Inspection Report 83-31) will be beneficial in improving performance of the program. We feel that this program is the most viable means of providing corrective actions to calibration drift resulting from temperature and hysteresis effects that we currently experience with our Barton transmitters.

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION REPORT 50-317/83-31; 50-318/83-31

The improved trending program is currently in effect and is described below.

1. During **MODES** 1 through 3 the following parameters are recorded:
 - a. Pressurizer pressure safety channels (I-PT-102A,B,C,D)
 - b. Pressurizer pressure (non-Barton) control channels (I-PT-100X,Y)
 - c. Primary System pressure as indicated from a temporary gauge associated with the primary sample system.
 - d. Containment temperature
 - e. Reactor power
2. These parameters are tabulated and plotted on a daily basis.
3. The results are reviewed and compared in the following manner:

MODES 1 and 2

Pressurizer pressure safety channels are compared to the pressurizer pressure control program setpoint (2250 psia at normal operating conditions). The Pressurizer pressure control program setpoint is verified daily by comparison with the Pressurizer pressure control channel instrumentation data.

Pressurizer pressure safety channels are compared to the temporary gauge data.

Any identified deviations approaching or exceeding 15 psi initiates actions to recalibrate the safety channel indication. The 15 psi limit is derived from the instrument error allowance in the high Pressurizer pressure and thermal margin/low pressure reactor protective system trip setpoints.

MODE 3

Pressurizer pressure safety channels A,B,C and D are compared individually per channel, then compared with control channel indications and finally compared with the temporary gauge indication. As with **MODES** 1 and 2, deviations greater than 15 psi prompt recalibration of the safety channel instrumentation.

To ensure that the safety channel instrumentation is operable prior to entry into modes requiring their operability, a revision has been made to the Pre-Startup Checklist (OP-6) to perform a channel check (similar to that required by surveillance testing during normal operation) prior to entry into **MODE** 3 from **MODE** 4. This revision was completed on February 6, 1984.

ENCLOSURE (1)

**REPLY TO APPENDIX A OF NRC INSPECTION
REPORT 50-317/83-31; 50-318/83-31**

In February of this year the improved trending program was instrumental in identifying safety channel drift and recalibration was performed as a result. It is our intent to continue this program until the Pressurizer pressure transmitters (I-PT-102A,B,C,D) are modified to correct the drift problem or are replaced with acceptable substitutes.