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May 5, 1992

COMMENTS OF OHIO CITIZENS FOR RESPONSIBLE ENERGY, INC. ("OCRE")  
ON "PROPOSED GENERIC COMMUNICATION NRC BULLETIN NO. 90-01,  
SUPPLEMENT 1: LOSS OF FILL OIL IN TRANSMITTERS MANUFACTURED BY  
ROSEMOUNT," 57 FED. REG. 11732 (APRIL 7, 1992)

OCRE supports the issuance of the proposed Supplement 1 to Bulletin 90-01. The need for additional actions has been well justified. The reliability of Rosemount transmitters has been called into question by the occurrence of failures. That these transmitters are often used in redundant divisions indicates the potential for common-mode failure. The staff's conclusion that ATWS frequency could be very sensitive to changes in transmitter failure rate compels additional action.

OCRE would commend the NRC for seeking public comment on this matter. OCRE hopes that the NRC will publish other proposed generic directives in the Federal Register for public comment.

OCRE would note the following typographical errors:

p. 11732, 3rd column, 4th line: "leading fill-oil" should be "leaking fill-oil".

p. 11732, 3rd column, 15th line up from the bottom:  
"manufacturer fund that" should be "manufacturer found that".

p. 11734, 2nd column, 16th line up from the bottom: "(senior module number" should be "(sensor module number".

p. 11735, 1st column, lines 15-17: delete "(2) replace them with qualified transmitters manufactured after July 11, 1989,".

OCRE agrees with the backfit discussion presented in the notice. The actions requested in the proposed supplement are clearly necessary to bring facilities into compliance with existing requirements, e.g., GDC 21, so no backfit analysis should be required.

However, OCRE would question whether the proposed supplement is being unduly restricted to the suspect lots of transmitters and to those transmitters with an operating pressure greater than 500 psi. The Federal Register notice states that Rosemount Model 1151 and Model 1152 transmitters have failed due to loss of fill-oil. The Cleveland Electric Illuminating Co., licensee for the Perry Nuclear Power Plant, in its December 6, 1991

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update of its response to Bulletin 90-01, noted that "the failure history of Rosemount Model 1153 transmitters at Perry indicates that approximately forty-two percent (42%) of the transmitters that have failed due to a sensor oil loss were not from suspect lots." The licensee states that any Model 1153 transmitter manufactured before July 11, 1989 has the potential to leak oil. Thus, OCRE would recommend that the NRC require monitoring for all Rosemount transmitters, regardless of whether they are from suspect lots.

With regard to pressure, OCRE notes a NUMARC letter, dated March 15, 1991 to Mr. Carl Berlinger of the NRC, in which NUMARC groups the transmitters by pressure and indicates that few failures have occurred for transmitters with an operating pressure less than 250 psi. OCRE would suggest that 250 psi, rather than 500 psi, may be a more appropriate cutoff point for licensee action.

Respectfully submitted,



Susan L. Hiatt  
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