Public Service Electric and Gas Company

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Vice President - Nuclear Operation

DEC 0 8 1992

NLR-N92168

U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Gentlemen:

STATUS OF ROSEMOUNT TRANSMITTERS SUBJECT TO BULLETIN 90-01 REQUIREMENTS HOPE CREEK GENERATING STATION DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) provided its response to Bulletin 90-01 "Loss of Fill Oil in Transmitters Manufactured by Rosemount" via four letters dated July 18, 1990 (NLR-N90149), October 18, 1990 (NLR-N90194), August 19, 1991 (NLR-N91136), and October 17, 1991 (NLR-N91155). Since that time, the NRC has published in the Federal Register (57FR11732), a notice to supplement Bulletin 90-01 which relaxes the requirements to replace "suspect" transmitters if additional requirements are met to assure continued reliability.

Based on our review of that notice, it has been determined by PSE&C that 12 transmitters scheduled for replacement during the fourth refueling outage (September 12, 1992 - November 11, 1992) did not require change-out. This was concurred with by the NRC via telecon on August 27, 1992 and September 3, 1992. PSE&G is providing this information formally at this time since the supplement which was scheduled to be issued in September has not yet been published.

The 12 transmitters discussed were not the subject of the original PSE&G commitments. However, Bulletin 90-01 section A-5 stated "Document and maintain in accordance with existing plant procedures a basis for continued operation covering the time period from the present until such time that the... transmitters from the manufacturing lots identified by Rosemount as having a high failure fraction due to loss of fill o'l in use in the reactor protection or engineering safety features actuation systems can be replaced...".

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The 12 transmitters internally scheduled for replacement during the fourth refueling outage were identified by PSE&G or Rosemount Technical Bulletin #4 addendum 2 and 3 after the original response to the Bulletin was made. These subsequent transmitters were incorporated into revisions to the original basis for continued operation (BCO) as required.

All of these transmitters have been incorporated into Hope Creek's enhanced surveillance program. Satisfactory trend data, calibration response, and process noise data (if applicable) has been observed and determined.

Nine of these transmitters are installed in low pressure applications (less than 500 psi) as defined by the referenced federal register notice and can be eliminated from any program prescribed in the original bulletin. The remaining three (medium pressure 500 - 1500 psi) will attain Rosemount's recommended psi-month maturity (60,000 psi-months) during January 1993.

The three medium pressure transmitters are range code 7 transmitters which provide reactor/steam line pressure signals. Two of the transmitters provide division I (redundant division is not effected) isolation signals for low pressure isolation of the high pressure coolant injection system (100 psi) and one transmitter provides a signal to the differential pressure control valve of the outboard main steam isolation valve sealing system (7 psi differential pressure at less than 25 psi main steam line pressure). On-line monitoring (process noise analysis) is not feasible for these transmitters due to saturated outputs at rated conditions (1000 psi). The enhanced surveillance program will continue to be implemented until maturity.

It should be noted that PSE&G has not determined if it will continue some form of enhanced surveillance even though the conditions for program elimination will soon be met.

PSE&G believes that the decision to not replace these transmitters at this time is consistent with the NRC's and our intent to assure high functional reliability and low probability of failure of transmitters while recognizing the appropriate conditions and indications which lead to transmitter failure. PSE&G will provide a complete response for all subject transmitters after the supplement is issued.

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If you have any questions regarding this information, please do not hesitate to call.

Sincerely,

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Mr. T. Martin, Administrator Region I

Mr. T. Johnson Senior Resident Inspector

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