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SUBJECT: Provides engineering evaluation re loss of signal from
 containment monitoring sys.

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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SUBJECT: NUCLEAR PLANT NO. 2
CONTAINMENT MONITORING SYSTEM

As requested by our resident inspector we are providing a discussion of the engineering evaluation of the safety significance associated with the possible loss of signal from instrument CMS-TE-12 (containment monitoring system - temperature element -12). The purpose of this TE is to measure the discharge air temperature from containment fan cooler CMS-FC-1C.

Our Master Equipment List (MEL) originally indicated that this temperature element was safety related and required to be a Regulatory Guide 1.97, category 2 instrument as a parameter to be monitored during a post-accident condition.

WNP-2 compliance with the requirements of Regulatory Guide 1.97 was formulated in 1980 and became design specific in 1981/1982. One of the parameters required to be monitored by the Regulatory Guide is "Drywell Atmosphere Temperature". It was not known in 1981/1982 exactly which of the many temperature elements provided in the drywell would ultimately be identified by Emergency Operating Procedures as those necessary to determine bulk drywell temperature. For this reason, WNP-2 conservatively assigned all temperature elements providing signals to recorders CMS-TR-5 and -6 (selected as the Regulatory Guide 1.97 display instrumentation) as post-accident temperature monitors. The FSAR does not specifically identify which temperature elements (inputting to these recorders) are to be used in the determination of bulk temperature.

The current Emergency Operating Procedures identify reliance on only four specific temperature elements (i.e., CMS TE-1, 2, 8 and 26). Adequate channel isolation exists to prevent interaction between other temperature elements and those assigned as Regulatory Guide 1.97 monitors. Additionally, since these are Regulatory Guide 1.97 category 2 monitors only a single recorder is required; CMS-TR-5 has been selected. CMS-TE-12 does not provide a signal to this recorder. Considering the above, CMS-TE-12 has no safety function and, therefore, loss of signal from this instrument has no safety significance.

Therefore, it is acceptable to remove the Regulatory Guide 1.97 category 2 assignment to CMS-TE-12, as well as other similar temperature elements, and to then identify them as Quality Class 2. A MEL change request is being processed to downgrade all other similar TE's to Quality Class 2 equipment.

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PAGE TWO

Additionally, our resident Inspector requested that we provide a discussion of our reevaluation of work performed by the I&C technician that reworked the electrical splice associated with CMS-TE-12 without authorization.

That technician's normal work involves Surveillance testing and preventative maintenance. Few (approximately 6) work packages (Maintenance Work Requests) have been assigned to him in the last two years. The Supply System reviewed a selection of his completed Surveillances (17 total) with a comparison being made between his Surveillance and the next completion of the Surveillance (one month later). Recorded data was compared between the two Surveillances with any major offsets being referred to the trend program for additional review. The reviews did not find any completed Surveillances requiring additional inspection or rework.

PM's were reviewed (10 total) by inspecting the completed work sheets against criteria established on Master Data Sheets. The worksheets were all found to be completed satisfactorily in the critical areas of calibration data, determ/reterm activities and valving instruments back into service.

Three Maintenance Work Requests (MWR) were reviewed and field inspection was performed. These three MWR's involved two resistance temperature detectors (RTD) and two type T thermocouples. Splices were not involved and all installations were inspected and found to be correct. Paperwork review shows that worksheets and reterm/determ sheets had been properly completed.

We have concluded that this unauthorized work activity by the craftsman was isolated.

Very truly yours,



G.C. Sorensen

Manager, Regulatory Programs

cc: JD Martin - Region V
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