

(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

setpoint from being reached during a LOCA.

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

LOCA if the indicated to actual level difference was large.

PHONE: 315-343-2110, Ext. 1208

February 15, 1980

Mr. Boyce Grier, Director
United States Nuclear Regulatory
Commission - Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Re: Docket No. 50-220
LER 80-05

Dear Mr. Grier:

The GE SIL 299 outlining the possible errors in water level instrumentation indication was received on July 30, 1979. A Part 21 evaluation was initiated to determine the implications of the difference in actual to indicated water level on the projected PCT's during postulated LOCA's. Results of these preliminary conservative calculations indicated that PCT's would not be significantly affected (i.e., $\Delta PCT < 200^\circ F$). These results appeared consistent with that which would be expected since during the accident, initiation is relatively fast and water level instrumentation heatup with the associated inaccuracy is slow. Since the calculations indicated no significant problem existed, formal write-up, analysis and concurrence was completed on a low priority basis on October 14, 1979. No further action was required.

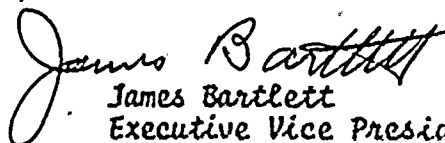
As a result of the long term THM modifications, NM Engineering was in the process of developing improved core water level monitoring capabilities. As a result of this engineering effort and to more precisely measure the actual to indicated water level difference due to heat up, ~~it was discovered that, due to the design of the current system, indicated LLL may not be reached if the indicated to actual water level difference was large during a postulated LOCA.~~

An analysis was initiated to determine the effect of the instrumentation heatup outlined in GE SIL 299 on PCT's including the newly discovered geometric configuration problems. These analyses indicated that for a majority of accident scenarios, system design did not preclude LLL water level initiation. However, for small steam and water breaks,

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conservative evaluation of available data indicated that the design of the LLL water level indication instrumentation may preclude this setpoint from being reached. More detailed analysis of drywell temperature, reactor water level and pressure may show LLL level indication would initiate or that it may not be required due to normal reactor pressure decreases. However, based on available data it was concluded that a recalibration of the LLL setpoint was required. These analyses were completed on February 1, 1980.

Very truly yours,


James Bartlett
Executive Vice President

jrl/

10-11-12