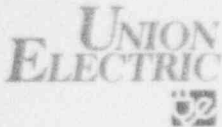


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Donald F. Schnell
Senior Vice President
Nuclear

February 23, 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

ULNRC-2766

DOCKET NUMBER 50-483
CALLAWAY PLANT
NRC BULLETIN 90-01, SUPPLEMENT 1: LOSS OF FILL-OIL IN
TRANSMITTERS MANUFACTURED BY ROSEMOUNT
Reference: ULNRC-2255 dated July 18, 1990

The attachment to this letter addresses the requested reporting requirements in Bulletin No. 90-01 Supplement 1 concerning failure of Rosemount transmitters.

If there are any questions concerning this issue, please contact us

Very truly yours,

Donald F. Schnell

GGY/plh

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STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 23rd day
of February, 1992. BP
1993

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Provide within 60 days after receipt of this bulletin a response that includes the following:

1. A statement whether the licensee will take the actions requested above (as stated on pages 9-11 of the supplement).

Union Electric Response

Union Electric will replace one transmitter (used to monitor CVCS Seal Water Injection Flow), as discussed below. No other specific actions are required at Callaway.

2. With regard to the actions requested above that the licensee is taking:
 - a. A list of the specific actions that the licensee will complete to meet Item 1 of the Requested Actions for Operating Reactors provided in this supplement, including justifications as appropriate.
 - b. The schedule for completing licensee actions to meet Item 1 of Requested Actions provided in this supplement.
 - c. When completed, a statement confirming that Items 1 and 2 of Requested Actions for Operating Reactors provided in this supplement have been completed.

Union Electric Response

Our original Bulletin No. 90-01 response, ULNRC-2255 dated July 18, 1990, discussed the identification of 118 Rosemount Model 1153 Series B and D transmitters at Callaway. That letter should have clarified that three of those 118 are used in non-safety applications such that 115 transmitters fell under the scope of the Bulletin. Since that time, two additional Rosemount Model 1153 Series B transmitters have been installed in applications that previously used Barton transmitters (i.e. BG-FT-0215A & B, CVCS Seal Water Injection Flow). As of this date there are 117 Rosemount Model 1153 Series B and D transmitters used in safety-related applications at Callaway. Of these 117, 60 transmitters are non-1E and safety-related for pressure boundary integrity only. Loss of fill-oil from the sensor module of these non-1E transmitters would have no safety impact since the safety function, pressure boundary integrity, is ensured by the process O-ring. These 60 transmitters were not included in the following scope of activities, as originally highlighted in ULNRC-2255. The 57 Class 1E Rosemount transmitters fall into the following categories as called out in the supplement:

1. RPS, ESFAS, and AMSAC systems, normal operating pressure >1500 psi - No such Rosemount transmitters are used at Callaway.
2. All other safety-related systems, normal operating pressure >1500 psi - There are five such Rosemount transmitters used at Callaway. Four of these five have sensor modules manufactured after July 11, 1989 (sensor module serial numbers greater than 2182605). On August 9, 1990 one of the transmitters used to measure CVCS Seal Water Injection Flow, BG-FT-0215A, was replaced with a Rosemount Model 1153 Series B transmitter that has a sensor module manufactured before July 11, 1989. This transmitter will be replaced with one manufactured after July 11, 1989. This replacement will be made as soon as possible, certainly prior to startup from the next refueling outage, scheduled for the fourth quarter of this year. We have no spare transmitters for this application, therefore a new transmitter has been ordered. Were it not for two refueling outages since it was installed, this transmitter would have surpassed the 60,000 psi-month service threshold criterion after which quarterly monitoring could be extended to 18-24 months per the supplement. With consideration given to this service period as well as to the indication-only function of this transmitter and the fact that its redundant transmitter, BG-FT-0215B, has a sensor module manufactured after July 11, 1989, we do not intend to develop an enhanced surveillance monitoring program for this one transmitter prior to its being replaced later this year.
3. RPS, ESFAS, and AMSAC systems, normal operating pressure >500 psi and ≤1500 psi - No such Rosemount transmitters are used at Callaway.
4. All other safety-related systems, normal operating pressure >500 psi and ≤1500 psi - There are eight such transmitters used at Callaway. Five of these eight have sensor modules manufactured after July 11, 1989. The other three have surpassed the 60,000 psi-month service threshold criterion and, as allowed by the supplement, will not be subject to an enhanced surveillance monitoring program.
5. All safety-related systems, normal operating pressure ≤500 psi - There are 44 such transmitters used at Callaway, including 7 auxiliary feedwater (AFW) flow transmitters that are subject to AFW pump discharge pressures greater than 1000 psi when the pumps are running; however, since this standby system is not normally operating there is no pressure on these transmitters during normal operation. There has been no indication at Callaway that these AFW flow transmitters have experienced any symptoms of a loss of fill-oil. As allowed by the supplement, these transmitters will not be subject to an enhanced surveillance monitoring program.

With regard to the above transmitters with sensor modules manufactured prior to July 11, 1989 that either have surpassed the 60,000 psi-month service threshold criterion or are used in low pressure applications, we will maintain a high degree of confidence for detecting failures caused by a loss of fill-oil and we will maintain a high degree of reliability for these transmitters, commensurate with their safety significance.

In summary, there is no requirement for an enhanced surveillance monitoring program at Callaway given the replacement of one transmitter prior to startup from the next refueling outage. The NRC will be notified after the BG-FT-0215A transmitter is replaced.

3. A statement identifying those actions requested by the NRC that the licensee is not taking and an evaluation which provides the bases for not taking the requested actions.

As discussed above, we do not intend to develop a quarterly enhanced surveillance monitoring program for one transmitter, BG-FT-0215A, prior to its being replaced later this year. This transmitter will be replaced with one manufactured after July 11, 1989. This replacement will be made as soon as possible, certainly prior to startup from the next refueling outage, scheduled for the fourth quarter of this year. Prior to being replaced, the installed transmitter will surpass the 60,000 psi-month service threshold criterion after which quarterly monitoring could be extended to 18-24 months per the supplement. We do not believe it to be cost-effective or necessary to implement an enhanced surveillance monitoring program on an interim basis for this one transmitter if consideration is given to its service thus far as well as to its indication-only function and the fact that it has a redundant transmitter, BG-FT-0215B, which has a sensor module manufactured after July 11, 1989.