

Georgia Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 877-7122

C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



February 26, 1993

ELV-05225  
003019

Docket Nos. 50-424  
50-425

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

VOGTLE ELECTRIC GENERATING PLANT  
NRC BULLETIN 90-01, SUPPLEMENT 1  
LOSS OF FILL-OIL IN TRANSMITTERS  
MANUFACTURED BY ROSEMOUNT

Gentlemen:

NRC Bulletin 90-01, Supplement 1, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount," was issued on December 22, 1992, to all holders of operating licenses or construction permits for nuclear power reactors. Supplement 1 to the bulletin updates the information provided in the original bulletin and requests that licensees take actions to resolve the loss of fill-oil issue for Rosemount transmitters manufactured prior to July 11, 1989. The requested actions described in the supplement supersede the actions requested in the original bulletin, issued on March 9, 1990. Within 60 days after receipt of the supplement licensees are required to provide a response that includes the following:

1. A statement whether the licensee will take the actions requested,
2. With regard to the requested actions that the licensee is taking:
  - a. A list of the specific actions that the licensee will complete to meet Item 1 of 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.
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.

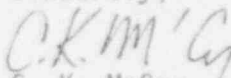
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In response to NRC Bulletin 90-01, Supplement 1, Georgia Power Company (GPC) will implement actions to meet the intent of Item 1. The enclosure provides a discussion of each of the NRC requested actions, along with GPC's response. The information and schedule requested by reporting requirements 2a and 2b are also provided in the enclosure as part of the GPC response to each item.

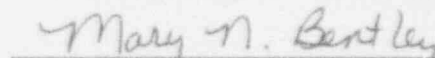
Mr. C. K. McCoy states he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

Sincerely,

  
C. K. McCoy

Sworn to and subscribed before me

this 26<sup>th</sup> day of February 1993.

  
Notary Public

My Commission Expires: MY COMMISSION EXPIRES 12/31/93

CKM/DLB/gmb

Enclosure

xc: Georgia Power Company  
Mr. W. B. Shipman, General Manager  
Mr. M. Sheibani, Plant Engineer Supervisor  
NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.  
Mr. D. S. Hood, Licensing Project Manager, NRR

U. S. Nuclear Regulatory Commission, Region II  
Mr. S. D. Ebner, Regional Administrator  
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT  
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REQUESTED ACTIONS

1. Supplement 1, Items 1 and 1a.

Review plant records and identify any Rosemount Model 1152 Series B, Model 1153 Series D, and Model 1154 transmitters manufactured before July 11, 1989, that are used or may be used in the future in either safety-related systems or systems installed in accordance with 10 CFR 50.62 (the ATWS rule), and

- a. Expeditiously replace, or monitor for the life of the transmitter on a monthly basis using an enhanced surveillance monitoring program, any transmitters that have a normal operating pressure greater than 1500 psi and that are installed in reactor protection trip systems, ESF actuations or ATWS systems. Action for those transmitters that have not met the Rosemount psi-month threshold criterion should be expedited. At their discretion, licensees may monitor using an enhanced surveillance program at least once every refueling cycle, but not exceeding 24 months, transmitters in this category if the appropriate psi-month threshold criterion recommended by Rosemount has been reached, and the monitoring interval is justified based upon transmitter performance in service and its specific safety function. The justification should show that a sufficiently high level of reliability for the function is provided by the redundancy or diversity of applicable instrumentation and control systems, commensurate with the importance of the function, when considered in conjunction with the overall performance of the reactor protection trip system, ESF actuation system, or ATWS system. Provide to the NRC a copy of the licensee justification to extend the enhanced surveillance program beyond the monthly test interval for transmitters that have reached the appropriate psi-month threshold criterion recommended by Rosemount.

Georgia Power Company Response

Vogtle Electric Generating Plant (VEGP) utilizes six transmitters, three per unit, that have a normal operating pressure greater than 1500 psi and are installed in reactor protection trip systems, engineered safety features (ESF) actuation systems, or anticipated transient without scram (ATWS) systems. These transmitters have been replaced with Rosemount transmitters manufactured after July 11, 1989, or that have been refurbished in response to the loss of fill-oil issue.

ENCLOSURE (CONTINUED)

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REQUESTED ACTIONS

2. Supplement 1, Item 1b

Replace, or monitor for the life of the transmitter on a quarterly basis using an enhanced surveillance monitoring program, any transmitters that have a normal operating pressure greater than 1500 psi and that are used in safety-related applications but are not installed in reactor protection trip systems, ESF actuation systems, or ATWS systems. At their discretion, licensees may monitor using an enhanced surveillance program at least once every refueling cycle, but not exceeding 24 months, transmitters in this category if the appropriate psi-month threshold criterion recommended by Rosemount has been reached, and the monitoring interval is justified based upon transmitter performance in service and its specific function. Provide to the NRC a copy of the licensee justification to extend the enhanced surveillance program beyond the quarterly test interval for transmitters that have reached the appropriate psi-month threshold criterion recommended by Rosemount.

Georgia Power Company Response

Transmitters with a normal operating pressure greater than 1500 psi that are used in safety-related applications but are not installed in reactor protection trip systems, ESF actuation systems, or ATWS systems are not utilized at VEGP.

3. Supplement 1, Item 1C

Replace, or monitor at least once every refueling cycle, but not exceeding 24 months, using an enhanced surveillance program until the transmitter reaches the appropriate psi-month threshold criterion recommended by Rosemount, any transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi and are installed in reactor protection trip systems, ESF actuation systems, or ATWS systems.

Georgia Power Company Response

VEGP utilizes 22 of these transmitters, 11 per unit, in the auxiliary feedwater system. The normal operating pressure for these transmitters varies from 1200 psi to 1500 psi. These transmitters are usually in

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standby and are subjected to their normal operating pressure when the unit is in modes 2, 3, or 4 and for only a few additional hours during monthly and quarterly system operation surveillances and solid state protection system slave relay surveillances. One transmitter in each unit has already been replaced with a transmitter manufactured or refurbished after July 11, 1989. Eighteen of these transmitters, nine for each unit, are calibrated in accordance with an 18-month calibration schedule; the other four, two for each unit, are calibrated in accordance with a 24-month calibration schedule. The calibration data for these transmitters, excluding the two that have been replaced, are then trended in accordance with our enhanced surveillance program to ensure that any transmitter exhibiting symptoms indicative of a loss of fill-oil is promptly identified and addressed.

4. Supplement 1, Item 1d.

Replace, or monitor at least once every refueling outage, using an enhanced surveillance monitoring program until the transmitter reaches the appropriate psi-month threshold criterion recommended by Rosemount, any transmitters used in safety-related systems that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi, and that are not installed in reactor protection trip systems, ESF actuation systems, or ATWS systems.

Georgia Power Company Response

Vogtle Electric Generating Plant utilizes eight transmitters, four for each unit, in the main steam system for the atmospheric relief valves. Four of the transmitters have been replaced with Rosemount transmitters that were manufactured or refurbished after July 11, 1989. The other four transmitters are scheduled for replacement during 1993. Until they can be replaced, an enhanced surveillance is performed monthly on the transmitters. The pressure reading of the subject transmitter is compared to other transmitters, not of the same make and model, that are monitoring the same process fluid. This comparison ensures that any transmitter exhibiting symptoms indicative of a loss of fill-oil will be promptly identified and addressed.



ENCLOSURE (CONTINUED)

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REQUESTED ACTIONS

5. Supplement 1, Item 1e.

At licensee discretion, exclude from the enhanced surveillance program any transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi that have reached the appropriate psi-month threshold criterion recommended by Rosemount (60,000 psi-months or 130,000 psi-months depending on the range code of the transmitter). A high degree of confidence should be maintained for detecting failure of these transmitters caused by a loss of fill-oil and a high degree of reliability should be maintained for the function consistent with its safety significance.

Georgia Power Company Response

Vogtle Electric Generating Plant has no transmitters which have reached the appropriate psi-month threshold criterion recommended by Rosemount.

6. Supplement 1, Item 1f.

At licensee discretion, exclude from the enhanced surveillance program any transmitters that have a normal operating pressure less than or equal to 500 psi. A high degree of confidence should be maintained for detecting failure of these transmitters caused by a loss of fill-oil and a high degree of reliability should be maintained for the function consistent with its safety significance.

Georgia Power Company Response

Vogtle Electric Generating Plant will exclude from the enhanced surveillance program any transmitters that have a normal operating pressure less than or equal to 500 psi.

7. Supplement 1, Item 2.

Evaluate the enhanced surveillance monitoring program to ensure that the program provides measurement data with an accuracy range consistent with that needed for comparison with manufacturer drift criteria for determining degradation caused by a loss of fill-oil.

ENCLOSURE (CONTINUED)

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GPC Response

In establishing the enhanced surveillance monitoring program, GPC ensured that the program provided measurement data with an accuracy range consistent with that needed for comparison with manufacturer drift criteria for determining degradation caused by a loss of fill-oil. This was achieved by using the manufacturer's drift data criteria and evaluating each transmitter on an individual basis. This ensures that transmitters exhibiting symptoms indicative of loss of fill-oil are promptly identified and any transmitter exhibiting loss of fill-oil is addressed before the operability of the instrument is challenged.