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Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Illinois Power's Response to Bulletin 90-01,
Supplement 1, "Loss of Fill-Oil in Transmitters
Manufactured by Rosemount"

Dear Sir:

On January 4, 1993, Illinois Power (IP) received Bulletin 90-01, Supplement 1, from the Nuclear Regulatory Commission (NRC). The NRC requested that IP respond to the bulletin by identifying any Rosemount Model 1153 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 safety-related systems or systems installed in accordance with 10CFR50.62, "Requirements for Reduction of Risk From Anticipated Transients Without SCRAM (ATWS) Events for Light-Water Cooled Nuclear Power Plants."

IP has completed this action and the identified transmitters have been placed into categories based on their application and time in operation as described in the bulletin. The categories that are applicable to Clinton Power Station (CPS) and the status of the transmitters in those categories are provided below. The related subsection from the "requested actions" section of the bulletin is also provided. CPS does not have any transmitters installed for use as described in subsection "a" of the "requested actions" section of the bulletin. Transmitters installed for use as described in subsections "e" and "f" are not addressed since the NRC has allowed them to be excluded from the enhanced surveillance program.

Category 1) subsection b)	This category consists of transmitters that have an operating pressure greater than 1500 pounds per square inch (psi) and are used in a safety-related application, but are not installed in a reactor protection system, engineered safety feature (ESF) actuation system, or an ATWS system. These transmitters are to be monitored with an enhanced surveillance monitoring program for the life of the transmitter on a quarterly basis.
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CPS has two transmitters installed for use in this category. Both are presently monitored with an enhanced surveillance program by monitoring redundant channels at least once a quarter and, therefore, comply with the requirements of this supplement to Bulletin 90-01.

Category 2)
subsection c)

This category consists of transmitters that have an operating pressure between 500 psi and 1500 psi and initiate reactor protection or ATWS trips for high pressure or low water level. These transmitters are to be monitored with an enhanced surveillance monitoring program on a monthly basis.

CPS has thirteen transmitters installed for use in this category. They are presently monitored with an enhanced surveillance program by monitoring redundant channels at least once a month and, therefore, comply with the requirements of this supplement to Bulletin 90-01.

Category 3)
subsection c)

This category consists of transmitters that have an operating pressure between 500 psi and 1500 psi and are installed in a reactor protection system, ESF actuation system, or ATWS system. These transmitters are to be monitored with an enhanced surveillance monitoring program on a monthly basis. These transmitters may be monitored on a refuel-cycle basis if sufficient justification is presented based on in-service performance of the transmitters and their safety function.

CPS has 53 transmitters installed for use in this category. 33 of these transmitters are presently monitored with an enhanced surveillance program by monitoring redundant channels at least once a month and, therefore, comply with the requirements of this supplement to Bulletin 90-01. The remaining 20 transmitters in this category are presently monitored with an enhanced surveillance program by trending zero and span drift at least once each refuel cycle. Because of their application (i.e., they are off-scale during normal plant operation or they do not have a redundant channel), they are not monitored monthly. Justification based on in-service performance will be available for review by May 31, 1993.

Category 4)
subsection d)

This category consists of transmitters that have an operating pressure between 500 psi and 1500 psi and are used in a safety-related application but are not installed in a reactor protection system, ESF actuation system, or an ATWS system. These transmitters are to be monitored with an enhanced

surveillance monitoring program once every refuel cycle.

CPS has eleven transmitters installed for use in this category. They are presently monitored with an enhanced surveillance program by monitoring zero and span drifts at least once each refuel cycle and, therefore, comply with the requirements of this supplement to Bulletin 90-01.

The transmitters will continue to be monitored as described in each category until they are replaced with a transmitter manufactured after July 11, 1989, or until they reach their appropriate psi-month threshold.

At the NRC's request IP evaluated the enhanced surveillance monitoring program used at CPS to ensure that the program provides measurement data with an accuracy range consistent with that needed for comparison with manufacturer drift data criteria for determining degradation caused by a loss of fill-oil. This evaluation verified that the enhanced surveillance monitoring program in use at CPS does provide the appropriate measurement data.

In conclusion, IP complies with Bulletin 90-01, Supplement 1, with the exception of completing the justification for monitoring the twenty transmitters discussed in category 3 on a once each refuel-cycle basis. This justification will be completed by May 31, 1993.

I hereby affirm that the information provided in this letter is correct to the best of my knowledge.

Sincerely yours,



J. S. Perry
Senior Vice President

WTD/msh

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety
Nuclear Management and Resources Council