

Duquesne Light Company

Beaver Valley Power Station
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March 8, 1993

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Response To NRC Bulletin 90-01, Supplement 1

Bulletin 90-01, Supplement 1, requested a response which describes DLC actions to resolve concerns related to potential loss of fill oil on some Rosemount transmitters. DLC has identified pertinent models manufactured before July 11, 1989 which are used in safety-related or ATWS applications. The following responses are provided for each of the requested actions found in the Supplement:

1.a. Requested Action:

Expediently 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 actuation systems 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 systems, 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.

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Response:

DLC has no immature high pressure transmitters in service. Three mature high pressure transmitters are installed in BVPS-1 and are currently included in an enhanced surveillance program with an 18-month frequency. Since the Unit is scheduled for a refueling outage which begins in less than one month, DLC plans to provide a supplemental response containing written justification for a frequency which is less often than monthly. This response will be provided prior to startup from this outage (currently scheduled for May 31, 1993).

1.b. Requested Action:

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.

Response:

DLC has no immature high pressure transmitters in service. Four mature high pressure transmitters are installed in BVPS-1 and are currently included in an enhanced surveillance program with an 18-month frequency. Since the Unit is scheduled for a refueling outage which begins in less than one month, DLC plans to provide a supplemental response containing written justification for a frequency which is less often than quarterly. This response will be provided prior to startup from this outage (currently scheduled for May 31, 1993).

1.c. Requested Action:

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 that are installed in reactor protection trip systems, ESF actuation systems, or ATWS systems.

Response:

Immature medium pressure transmitters are currently included in an enhanced surveillance program with an interval not exceeding 24 months. This action is complete.

1.d. Requested Action:

Replace, or monitor at least once every refueling cycle, but not exceeding 24 months, 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.

Response:

Immature medium pressure transmitters are currently included in an enhanced surveillance program with an interval not exceeding 24 months. This action is complete.

1.e. Requested Action:

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.

Response:

Mature medium pressure transmitters are currently included in an enhanced surveillance program with an interval not exceeding 24 months. When DLC is satisfied that a high degree of confidence is maintained for detecting failure due to loss of fill oil and that a high degree of reliability is being maintained consistent with its safety significance, these transmitters may be eliminated from the enhanced surveillance program. This action is complete.

1.f. Requested Action:

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.

Response:

Low pressure transmitters are not currently included in an enhanced surveillance program. DLC plans to further evaluate these transmitters prior to the end of the BVPS-1 refueling outage. Where DLC is satisfied that a high degree of confidence is maintained for detecting failure due to loss of fill oil and that a high degree of reliability is being maintained consistent with its safety significance, these transmitters will not be added to the enhanced surveillance program. All other low pressure transmitters which the Bulletin describes will be added to the program. A supplemental response to this item will be provided prior to startup from the BVPS-1 outage (currently scheduled for May 31, 1993).

2. Requested Action:

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 data criteria for determining degradation caused by a loss of fill-oil.

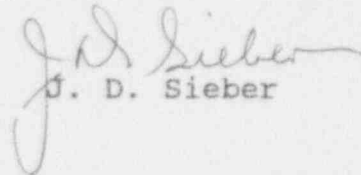
Response:

The enhanced surveillance program provides measurement data with an accuracy range as described in the staff conclusion 3 of the supplement. This action is complete.

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Should you have any questions regarding our actions related to this Bulletin, please direct them to G. L. Beatty at (412) 393-5225.

Sincerely,


J. D. Sieber

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. M. L. Bowling (VEPCO)

COMMONWEALTH OF PENNSYLVANIA)) SS:
COUNTY OF BEAVER)

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Before me, the undersigned notary public, in and for the County and Commonwealth aforesaid, this day personally appeared John D. Sieber, to me known, who being duly sworn according to law, deposes and says that he is Senior Vice President and Chief Nuclear Officer of the Nuclear Power Division, Duquesne Light Company, he is duly authorized to execute and file the foregoing submittal on behalf of said Company, and the statements set forth in the submittal are true and correct to the best of his knowledge, information and belief.

John D. Sieber
John D. Sieber

Subscribed and sworn to before me
on this 5th day of March, 1993.

Sheila M. Frattore
Notary Public

