



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

September 10, 1994

Mr. William Russell, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Byron Units 1 and 2 <sup>454</sup>  
NRC Docket Numbers 50-~~545~~ and 50-455

- References:
- 1) Teleconference dated May 18, 1994, between Commonwealth Edison Company (ComEd) and the Nuclear Regulatory Commission (NRC) concerning the Request for Additional Information pertaining to Rosemount Transmitters
  - 2) M. Richter letter to Nuclear Regulatory Commission dated July 20, 1990, transmitting Commonwealth Edison's Response to IE Bulletin 90-01, "Loss of Fill Oil in Transmitters Manufactured by Rosemount"

Dear Mr. Russell,

As discussed during the referenced teleconference, Commonwealth Edison Company is responding the Nuclear Regulatory Commission's verbal request for additional information concerning Commonwealth Edison Company's response to IE Bulletin 90-01, "Loss of Fill Oil in Transmitters Manufactured by Rosemount" as transmitted in Reference 2. The attached addresses Byron's response.

If you have any questions concerning this matter, please address them to this office.

Sincerely,

Denise M. Saccomando  
Nuclear Licensing Administrator

Attachment

cc: G. Dick, Byron Project Manager-NRR  
H. Peterson, Senior Resident Inspector-Byron  
J. Martin, Regional Administrator-RIII  
Officer of Nuclear Facility Safety-IDNS

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## Attachment

### Question:

"Need more info on their enhanced monitoring program w.r.t. Rosemount Technical Bulletin #4. ie. How does what they are doing compare to RTB #4? How are they gathering and trending the data? Are they trending zero drift and span drift? Are they trending operating data? What do they do if they find a transmitter that is possibly leaking fill-oil?"

### ComEd's Response:

IE Bulletin 90-01, Requested Action 4.b called for an enhanced monitoring program for Rosemount transmitters to identify sustained drift. Commonwealth Edison complied with this request by developing a software program based on Rosemount's Technical Bulletin #4, dated December 22, 1989. The program is based on Appendix A, "Drift Analysis Guideline," Section 3.0, "Trending Calibration Data" of the Bulletin. As-found and as-left calibration records are entered into the program. The program calculates the transmitter zero drift as a percentage of nominal calibrated span using the range down factor (RDF) and % upper range limit (URL) as described in the bulletin. The program incorporates the High/Low Side Zero Shift drift limits for the various transmitter range codes presented in Bulletin #4, Table A1, "Maximum Allowable Cumulative Drift for 1153/1154 Oil Loss Transmitters." The cumulative zero drift is calculated, plotted over time, and monitored against the Rosemount drift limits. The cumulative zero drift is compared to the drift limits to determine if a limit is exceeded and/or provide a time estimate when a limit will be exceeded based upon the slope of the data. The program does not calculate span drift or utilize the High/Low Side Span Shift drift limits.

In addition to the software program described above, the Byron Station enhanced monitoring program includes implementation of Bulletin #4, Appendix B, Section 2.0, "Guideline for Detection of Sluggishness during a Standard Transmitter Calibration." Our experienced instrument technicians make a qualitative assessment of the transmitter during normal calibration looking for sluggish response.

Byron Station does not trend operating data. We do not have any Rosemount transmitters requiring enhanced surveillance frequencies as outlined in the Required Actions of Bulletin 90-01, Supplement 1.

At Byron Station, when a transmitter suspected of oil loss is identified, it is removed from service and returned to Rosemount for evaluation and repair/replacement.