



**CENTERIOR
ENERGY**

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VICE PRESIDENT - NUCLEAR

September 20, 1994
PY-CEI/NRR-1861L

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

Perry Nuclear Power Plant
Docket No. 50-440
Additional Information in Response to
NRC Bulletin 90-01, Supplement 1
(TAC #M85426)

Gentlemen:

The response to NRC Bulletin 90-01, Supplement 1 "Loss of Fill-Oil In Transmitters Manufactured by Rosemount" for the Perry Nuclear Power Plant (PNPP) was provided by letters dated March 11, 1993 (PY-CEI/NRR-1601L) and December 21, 1993 (PY-CEI/NRR-1717L). Additional information is provided below to answer a question raised during NRC staff review of this issue.

In Supplement 1 to NRC Bulletin 90-01, items e and f, the NRC noted that for those transmitters excluded, at licensee discretion, from the enhanced 18 month monitoring program, "a high degree of confidence should be maintained for detecting failure ... caused by a loss of fill-oil and a high degree of reliability should be maintained for the function consistent with its safety significance." The NRC has requested additional information with respect to the confidence level for detecting failures of transmitters caused by loss of fill-oil.

Presently, none of the installed transmitters covered by the Bulletin Supplement have been excluded from the enhanced 18 month monitoring program. After completion of the enhanced 18 month monitoring program (either for individual transmitters or in its entirety), methods to detect failure of the transmitters due to a loss of sensor fill-oil will still be in place. The operators and the I&C technicians have been trained on the sensor loss of fill-oil indications. The I&C technicians know how to identify the symptoms of a loss of sensor fill-oil during performance of periodic calibrations. Such calibrations are required to be performed on safety related instruments either by the Technical Specifications, or by Perry Nuclear Power Plant commitments to industrial standards. These calibration procedures currently contain a special pressure transient check which would identify transmitter failure due to loss

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of sensor fill-oil. This check will remain in the calibration procedures after the enhanced 18 month monitoring program is completed. Most of these transmitters also undergo channel checks on a frequent basis. The channel checks could possibly identify transmitter failures due to the loss of sensor fill-oil. Continuing use of these methods provides a high confidence level that Rosemount transmitter failures on loss of sensor fill-oil would be detected.

As stated above, none of the transmitters covered by the Bulletin have been excluded from the enhanced 18 month monitoring program. However, the actions implemented as described above give a high confidence level for identifying any transmitter failure on a loss of sensor fill-oil. This is sufficient to satisfy the concerns stated in the Bulletin Supplement for any transmitter that will be excluded from the enhanced 18 month monitoring program (or for all transmitters at the end of the enhanced 18 month monitoring program).

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager- Regulatory Affairs at (216) 280-5833.

Very truly yours,



RAS:GGR:sc

Attachment

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III