



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

June 8, 1984

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

Docket Nos.	50-317 50-318
License Nos.	DPR-53 DPR-69

ATTENTION: Mr. R. W. Starostecki, Director
Division of Project & Resident Programs

Gentlemen:

As a result of conversations between members of the Regional staff and our Electrical and Controls section we are providing clarification on a recent response to NRC Inspection Report 50-317/83-31; 50-318/83-31. Enclosure (!) to this letter provides clarification to Item A.2 of our March 8, 1984, response.

Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,

AEL/LOW/sjb

Enclosure

cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC

ENCLOSURE 1

REVISED REPLY TO APPENDIX A OF NRC INSPECTION REPORT NO. 50-317/83-31; 50-318/83-31

ITEM A.2

A violation was identified involving failure to maintain the Pressurizer pressure safety channels within required limits of accuracy (a problem previously identified due to environmentally induced temperature drift and hysteresis associated with installed Barton transmitters) in modes requiring operability of the instrumentation.

Upon reviewing the concerns expressed by the Resident Inspector in the Inspection Report, we have determined that incorporating some changes to the trending program (as described on page 8 of I&E Inspection Report 83-31) will be beneficial in improving performance of the program. We feel that this program is the most viable means of providing corrective actions to calibration drift resulting from temperature and hysteresis effects that we currently experience with our Barton transmitters.

The improved trending program is currently in effect and is described below.

1. During **MODES** 1 through 3 the following parameters are recorded:
 - a. Pressurizer pressure safety channels (1-PT-102A, B, C, D)
 - b. Pressurizer pressure (non-Barton) control channels (1-PT-100X,Y)
 - c. Primary System pressure as indicated from a temporary gauge associated with the primary sample system.
 - d. Containment Temperature
 - e. Reactor Power
2. These parameters are tabulated and plotted on a daily basis with the exception of item c, which is recorded weekly.
3. The results are reviewed and compared in the following manner:

MODES 1 and 2

Pressurizer pressure safety channels are compared to the pressurizer pressure control program setpoint (2250 psia at normal operating conditions). The Pressurizer pressure control program setpoint is verified daily by comparison with the Pressurizer pressure control channel instrumentation data.

Pressurizer pressure safety channels are compared to the temporary gauge data

Any identified deviation exceeding 10 psi initiates investigations to determine the rate of drift. This rate is used to schedule recalibration to prevent exceeding a 15 psi deviation. The 15 psi limit is derived from the instrument error allowance in the high Pressurizer pressure and thermal margin/low pressure reactor protective system trip setpoints.

ENCLOSURE 1

REVISED REPLY TO APPENDIX A OF NRC INSPECTION REPORT NO. 50-317/83-31; 50-318/83-31

MODE 3

Pressurizer pressure safety channels A, B, C and D are compared individually per channel, then compared with control channel indications and finally compared with the temporary gauge indication. As with **MODES** 1 and 2, a deviation greater than 10 psi will prompt scheduling recalibration of the safety channel instrumentation.

To ensure that the safety channel instrumentation is operable prior to entry into modes requiring their operability, a revision has been made to the Pre-Startup Checklist (OP-6) to perform a channel check (similar to that required by surveillance testing during normal operation) prior to entry into **MODE 3** from **MODE 4**. This revision was completed on February 6, 1984.

In February of this year the improved trending program was instrumental in identifying safety channel drift and recalibration was performed as a result. It is our intent to continue this program until the Pressurizer pressure transmitters (1-PF-102A, B, C, D) are modified to correct the drift problem or are replaced with acceptable substitutes.