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Writer's Direct Dial Number:

C321-92-2277  
October 7, 1992

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Licensee Event Report

This letter forwards one (1) copy of Licensee Event Report 92-12.

Sincerely,

John J. Barton  
Vice President and Director  
Oyster Creek

JJB/MH:jc  
Enclosure

cc: Administrator, Region 1  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager

(LER-COVLTR5)

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 6/31/88

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Oyster Creek, Unit 1

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TEXT (If more space is required, use additional NRC Form 368A (1))

DATE OF DISCOVERY

The condition described within this report was discovered on September 12,

IDENTIFICATION OF OCCURRENCE

During the performance of an Electromatic Relief Valve (ERV) Pressure Sensor Test and Calibration surveillance, two relief valves had high pressure relief setpoints above that specified in the Plant Technical Specifications. This event is considered to be reportable as defined in 10 CFR 50.73(a)(2)(i)(B).

CONDITIONS PRIOR TO DISCOVERY

The reactor was at approximately 100% power, with a generator load of approximately 630 megawatts electric.

DESCRIPTION OF OCCURRENCE

On September 12, 1992 at approximately 0800 hours, while performing the Electromatic Relief Valve (ERV) Pressure Sensor Test and Calibration surveillance, the "As Found" trip setpoint for the high pressure relief function on two ERVs was above that specified in the Technical Specifications. The Technical specification limit for ERV IA83B pressure sensor is 1104.5 psig and for ERV IA83C pressure sensor is 1096.8 psig. Test results determined the setpoint for IA83B was at 1106.0 psig and the setpoint for IA83C was at 1098 psig.

APPARENT CAUSE OF OCCURRENCE

The cause of this occurrence is attributed to instrument setpoint repeatability and instrument drift due to changing plant and environmental conditions. The tolerance between the "As Left" instrument setpoint and the Technical Specification is 10 psig. The design accuracy for these sensors is  $\pm 7.5$  psig. Therefore, design setpoint repeatability allows the "As Found" value to be within 2.5 psig of the Technical Specification limit.

A review of previous surveillance records indicated that these instruments frequently undergo additional drift during changes in plant pressure and operational conditions. A 2.5 psig additional drift beyond the 7.5 psig design tolerance would cause the instrument setpoint to exceed the Technical Specification limit. Instrument repeatability and drift cannot be improved due to the design of the switch used in this application.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If known, insert in parentheses, last additional NRC Form 388A-1 (17))

ANALYSIS OF OCCURRENCE AND SAFETY SIGNIFICANCE

The EMRVs are part of the Automatic Depressurization System (ADS) (E11S BM). This system is designed to depressurize the Reactor Coolant System (E11S AB) during small break Loss-of-Coolant Accident conditions so that the low pressure Core Spray System (E11S BM) can inject. The ADS function of the EMRVs is not affected by these switches. The EMRVs also provide a high pressure relief function for the reactor pressure vessel. Together with the high pressure scram function and the Isolation Condenser System (E11S BL), the EMRVs limit pressure in the Reactor Coolant System during high pressure transients to prevent exceeding the system pressure safety limit of 1375 psig.

This occurrence is considered to have minimal safety significance since the ADS function of the EMRVs is not affected by these pressure switches, all five EMRVs would have actuated to relieve pressure, and the Isolation Condenser System and turbine bypass valves were fully operable. A calculation concludes that even if all EMRVs exceeded their Technical Specification setpoints by 10 psig, there would be no adverse effect on plant safety. The drift experienced by the sensors in this report is much less than 10 psig above the Technical Specification setpoint (1.5 psig and 1.2 psig for 1A83B and 1A83C, respectively). In addition, the reactor safety valves are designed to prevent reaching the Reactor Coolant System pressure safety limit of 1375 psig on a complete loss of EMRV relief capability.

CORRECTIVE ACTION

The pressure switches were immediately adjusted to actuate within the Technical Specification limits. A new pressure sensing system has been selected to replace the present switch used in this application. The sensors selected will have an accuracy that will improve setpoint repeatability. This modification is currently included in the Oyster Creek Integrated Schedule as a Cycle 15 refueling outage project.

SIMILAR EVENTS

- LER 81-40 EMRV Pressure Sensor Test and Calibration
- LER 81-51 EMRV High Pressure Sensor
- LER 81-57 Reactor High Pressure Switch "B" EMRV
- LER 82-24 EMRV Switch Out of Tech Spec Limit
- LER 90-10 EMRV High Pressure Relief Setpoints Exceeded Tech Spec Limit Due to Drift
- LER 92-06 Electromatic Relief Valve High Pressure Relief Setpoints Exceeded Technical Specification Due to Drift