June 14, 2000

Mr. James Knubel
Chief Nuclear Officer
Power Authority of the State of
New York
123 Main Street
White Plains, NY 10601

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT: REQUEST FOR ADDITIONAL INFORMATION REGARDING IMPROVED TECHNICAL SPECIFICATION (ITS) 3.3.5.1 - EMERGENCY CORE COOLING SYSTEM INSTRUMENTATION TECHNICAL SPECIFICATIONS (TAC NO. MA5049)

Dear Mr. Knubel:

The NRC staff is currently reviewing the James A. FitzPatrick Improved Technical Specifications (ITS) Licensee Identified Beyond Scope Issues (LID BSI) Item No. 4 (ITS 3.3.5.1 - The Automatic Depressurization System (ADS) initiation timer and the Core Spray (CS) and the Low Pressure Coolant Injection (LPCI) pump start timer values) and LID BSI Item No. 5 (ITS 3.3.5.1 - CS, LPCI, and ADS Logic System Functional Test Frequency extension). We have concerns that you have not adequately addressed issues contained in Generic Letter (GL) 91-04 and Enclosure 2 of GL 91-04. In order to complete our evaluation of the proposed changes, please provide a response to the enclosed request for additional information by June 30, 2000, as agreed to by your staff.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure: As stated

cc w/encl: See next page

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Chief Nuclear Officer
Power Authority of the State of
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123 Main Street
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REQUEST FOR ADDITIONAL INFORMATION
JAMES A. FITZPATRICK NUCLEAR POWER PLANT

With regard to proposed change 3.3.5.1 ADS initiation timer and CS (core spray) and LPCI (low pressure coolant injection) pump start timer, please address the following:

1) Provide a summary description of the program for monitoring and assessing the effects of increased calibration surveillance intervals on instrument drift and its affect on safety.

2) Confirm that all conditions and assumptions of the setpoint and safety analyses have been checked and are appropriately reflected in the acceptance criteria of plant surveillance procedures for channel checks, channel functional test, and channel calibrations.

3) Confirm that the projected instrument errors caused by drift are acceptable for control of plant parameters to affect a safe shutdown with the associated instrumentation.

4) Confirm that a comparison of the projected instrument drift errors has been made with the values of drift used in the setpoint analysis. If this results in revised setpoints to accommodate larger drift errors, provide proposed TS changes to update trip setpoints. If the drift errors result in a revised safety analysis to support existing setpoints, provide a summary of updated analysis conclusions to confirm that safety limits and safety analysis assumptions are not exceeded.

5) Confirm that the magnitude of instrument drift has been determined with a high probability and a high degree of confidence for a bounding calibration interval of 30 months for each instrument type (make, model number, and range) and application that performs a safety function. Provide a list of the channels by TS section that identifies these instrument applications.

6) Confirm that the values of drift for each instrument type (make, model, and range) and application have been determined with a high probability and a high degree of confidence. Provide a summary of the methodology and assumptions used to determine the rate of instrument drift with time based upon historical plant calibration data.

7) Confirm that instrument drift as determined by as-found and as-left calibration data from surveillance and maintenance records has not, except on rare occasions, exceeded acceptable limits for a calibration interval.

With regard to proposed change 3.3.5.1 Core Spray, LPCI, and ADS Logic System Functional Test Frequency, please address the following:

1) Evaluate the effect on safety for the change in surveillance interval to 24 months and confirm that historical maintenance and surveillance data support your conclusion. Confirm that performance of the surveillance at 24 months would not invalidate any assumption in the plant licensing basis. In consideration of these confirmations, you need not quantify the effect of the change in surveillance intervals on availability of individual systems or components.

Enclosure

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