

James A. FitzPatrick
Nuclear Power Plant
268 Lake Road
P.O. Box 41
Lycoming, New York 13093
315-342-3840



November 3, 2000
JAFP-00-0259

Michael J. Colomb
Site Executive Officer

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

**James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333**

**Subject: Additional Information Regarding Proposed Technical Specification
Change Regarding Inservice Leak and Hydrostatic Testing Program**

Reference: 1. JAFP-00-0257, "Proposed Technical Specification Change (JPTS-95-004) Regarding Inservice Leak and Hydrostatic Testing Program"

Dear Sir:

The Authority requested the subject amendment to the Technical Specifications (Reference 1) be granted on an emergency basis. This letter provides additional details regarding the basis for requesting approval on an emergency basis.

10MOV-25B is a 24 inch diameter gate valve. This valve is the B division, inboard low-pressure coolant injection (LPCI) valve and also functions as a primary containment isolation valve (PCIV).

During the current Refuel Outage (RO14), this valve was subjected to a Type C Local Leak Rate Test (LLRT) as part of the plant 10CFR50 Appendix J Containment Leakage Rate Testing Program. This valve failed LLRT. The cause of the LLRT failure was determined to be a cracked seat. The repair activity required replacement of the valve disc. The tolerances of the valve internals are such that in order to achieve satisfactory LLRT results, the seat and disc must be "machined to fit" in the field. Proper tolerances are determined based on a "blue check" of the mating surfaces between the seat and disk.

Due to the machine to fit nature of this repair activity, achieving proper tolerances is an iterative process which requires a geometrically complex machining operation in the shop, followed by a check of tolerances in the field. This process is slow and meticulous because over-machining the disk would render the disc unusable and the process would have to start all over with a new disk. The difficulty in this process is compounded by the large size of the parts involved. The disk weighs approximately 1000 pounds and therefore must be handled with appropriate rigging.

Once proper tolerances are achieved, the valve must be reassembled and the valve operator must be mounted and set-up. Following this assembly process, the valve must be post-work tested. Post work testing involves an operator thrust test and LLRT.

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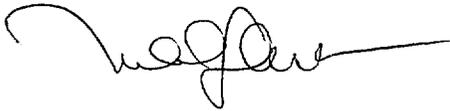
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Page -2-

The difficulties described above make accurate schedule estimates for the LLRT repair activity impractical. This activity could not have been accurately accounted for in designing the RO14 schedule and therefore provide the basis for the requesting approval of the subject amendment on an emergency basis.

If you have any questions regarding this matter, please contact Mr. George Tasick at (315) 349-6572.

Very truly yours,



Michael J. Colomb
Site Executive Officer

MJC:MA:las

cc: Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Office of the Resident Inspector
U. S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093

Guy Vissing, Project Manager
Project Directorate I
Division of Licensing Project Management
U.S. Nuclear Regulatory Commission
Mail Stop 8C2
Washington, DC 20555

STATE OF NEW YORK
COUNTY OF OSWEGO

Subscribed and sworn to before me
this 3rd day of November 2000.

TAMMY L. KIEPER 4985563
Notary Public, State of New York
Qualified in Oswego County
Commission Expires 8/19/01

