

August 24, 1995

Mr. William J. Cahill, Jr.
Chief Nuclear Officer
Power Authority of the State of
New York
123 Main Street
White Plains, NY 10601

SUBJECT: CORRECTION OF AMENDMENT NO. 226 FOR JAMES A. FITZPATRICK NUCLEAR
POWER PLANT (TAC NO. M91736)

Dear Mr. Cahill:

By letter dated August 8, 1995, the Commission issued Amendment No. 226 to Facility Operating License No. DPR-59 for the James A. FitzPatrick Nuclear Power Plant. The amendment consisted of changes to the Technical Specifications (TSs) in response to your application transmitted by letter dated March 2, 1995, extending the surveillance test intervals for the snubber systems to support 24-month operating cycles.

Due to an administrative error, the TS pages were issued without the changes being delineated by change bars. The corrected pages are enclosed.

I hope this error did not cause you any inconvenience.

Sincerely,

Original signed by:

C. E. Carpenter, Jr., Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure: As stated

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in black ink, appearing to read "C. E. Carpenter, Jr.", written in a cursive style.

C. E. Carpenter, Jr., Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure: As stated

cc w/encl: See next page

William J. Cahill, Jr.
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4.0 BASES

- A. This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL CONDITIONS (modes) for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL CONDITIONS (modes) are provided in the individual Surveillance Requirements.
- B. Specification 4.0.B establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance (e.g., transient conditions or other ongoing surveillance or maintenance activities). It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a 24 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of this specification is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. The limit on extension of the normal surveillance interval ensures that the reliability confirmed by surveillance activities is not significantly reduced below that obtained from the specified surveillance interval.
- C. This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance

C. Continued

interval, defined by the provisions of Specification 4.0.B, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.C. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.B, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.B is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant Technical Specifications.

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3.6 (cont'd)

2. With one or more snubbers inoperable, within 72 hours during normal operation, or within 7 days during Cold Shutdown or Refueling mode of operation for systems which are required to be operable in these modes, complete one of the following:
 - a. replace or restore the inoperable snubber(s) to operable status or,
 - b. declare the supported system inoperable and follow the appropriate limiting condition for operation statement for that system or,
 - c. perform an engineering evaluation to show the inoperable snubber is unnecessary to assure operability of the system or to meet the design criteria of the system, and remove the snubber from the system.

3. With one or more snubbers found inoperable, within 72 hours perform a visual inspection of the supported component(s) associated with the inoperable snubber(s) and document the results. For all modes of operation except Cold Shutdown and Refueling, within 14 days complete an engineering evaluation as per Specification 4.6.I.6 to ensure that the inoperable snubber(s) has not adversely affected the supported component(s). For Cold Shutdown or Refueling mode, this evaluation shall be completed within 30 days.

4.6 (cont'd)

2. Visual inspection shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movements can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.6.I.7 or 4.6.I.8, as applicable. Hydraulic snubbers which have lost sufficient fluid to potentially cause uncovering of the fluid reservoir-to-snubber valve assembly port or bottoming of the fluid reservoir piston with the snubber in the fully extended position shall be functionally tested to determine operability.

3. Once every 24 months, 10% of each type of snubbers shall be functionally tested for operability, either in place or in a bench test. For each unit and subsequent unit that does not meet the requirements of 4.6.I.7 or 4.6.I.8, an additional 10% of that type of snubber shall be functionally tested until no more failures are found, or all units have been tested.

JAFNPP

3.6 (cont'd)

4.6 (cont'd)

- c. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

9. Snubber Service Life Monitoring

A record of the service life of each snubber, whose failure could adversely affect the primary coolant or other safety-related system, the date at which the designated service life commences, and the installation and maintenance records on which the designated service life is based shall be maintained as required by specification 6.10.B.13.

Once every 24 months, the installation and maintenance records for each snubber, whose failure could adversely affect the primary coolant or other safety related system, shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

3.6 and 4.6 BASES (cont'd)

in each category from the previous inspection. The intervals may be increased up to 48 months if few unacceptable snubbers are found in the previous inspection. The visual inspection interval will not exceed 48 months. However, as for all surveillance activities, unless otherwise noted, allowable tolerances of 25% are applicable for snubbers. Table 4.6-1 establishes three limits for determining the next visual inspection interval corresponding to the population of each category of snubbers. For a category that differs from the representative sizes provided, the values for the next inspection interval may be found by interpolation from the limits provided in Columns A, B, and C. Where the limit for unacceptable snubbers in Columns A, B, or C is determined by interpolation and includes a fractional value, the limit may be reduced to the next lower integer. The first inspection interval determined using Table 4.6-1 shall be based upon the previous inspection interval as established by the requirements in effect before amendment 180. Any inspection whose results require a shorter inspection interval will override the previous schedule. When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model that have the same design features directly related to rejection of the snubber by visual inspection, and are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration. When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in

order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested every 24 months. Selection of representative sample of 10% of each type of safety related snubbers provides a confidence level within acceptable limits that these supports will be in an operable condition. Observed failures of these sample snubbers shall require functional testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

The service life of a snubber is evaluated using manufacturer input and information and also through consideration of the installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

DATED: August 24, 1995

AMENDMENT NO. 226 TO FACILITY OPERATING LICENSE NO. DPR-59-FITZPATRICK

Docket File

PUBLIC

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