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From: Andy Holliday Phone:

LICENSING DEPARTMENT Sending 315-349-6363
Fax:

Date: 8- Pages: 16 (incl cover)

CC: _____

Urgent For Review Please Comment Please Reply

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DRAFT

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station O-P1-17
Washington, DC 20555-0001

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Proposed One-Time-Only Emergency Change to the Technical Specifications Regarding Reserve A-C Power Allowable Out-Of-Service Time (JPTS-01-xxx)

Dear Sir:

This application for an emergency amendment to the James A. FitzPatrick Technical Specifications (TS) proposes a limited duration, one time only change to Specification 3.9.B.1 and associated Bases. Specifically, this change extends the Limiting Condition for Operation (LCO) allowable out of service time for one incoming Reserve A-C Power line (115KV line #3) and/or one reserve station transformer inoperable from 7 days to 14 days during the period commencing September 9, 2001 and extending through September 23, 2001.

The applicability of this proposed one-time-only change is limited to the period cited in order to allow sufficient time to complete the installation and testing of needed modifications. These modifications are needed to assure operability of 115 kV Reserve A-C Power line #3 under any combination of normal, safe shutdown, and engineered safeguards loads, as required by the licensing basis.

The signed original of the Application for Amendment to the Operating License is enclosed for filing. Attachment I contains the proposed new TS pages and Attachment II is the Safety Evaluation for the proposed changes. A markup of the affected TS pages is included as Attachment III.

A copy of this application and the associated attachments are being provided to the designated New York State official in accordance with 10 CFR 50.91.

There are no new commitments made in this letter. If you have any questions, please contact Mr. Andrew Halliday at 315-349-6055.

Very truly yours,

T. A. Sullivan

cc: next page
Attachments as stated

DRAFT

cc: Regional Administrator
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REVISED TECHNICAL SPECIFICATION PAGES

ONE-TIME-ONLY CHANGE TO THE TECHNICAL SPECIFICATIONS
REGARDING RESERVE A-C POWER ALLOWABLE OUT-OF-SERVICE TIME

DRAFT

**BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION**

In the Matter of)
Entergy Nuclear Operations, Inc.) Docket No. 50-333
James A. FitzPatrick Nuclear Power Plant)

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Entergy Nuclear Operations, Inc. requests an emergency amendment to the Technical Specifications (TS) contained in Appendix A to Facility Operating License DPR-59 for the James A. FitzPatrick Nuclear Power Plant. This application is filed in accordance with Section 10 CFR 50.90 of the Nuclear Regulatory Commission's regulations.

This application for an amendment to the James A. FitzPatrick Technical Specifications (TS) proposes a limited duration, one time only change to Specification 3.9.B.1 and associated Bases. Specifically, this change extends the Limiting Condition for Operation (LCO) allowable out of service time for one incoming Reserve A-C Power line (115KV line #3) and/or one reserve station transformer inoperable from 7 days to 14 days during the period commencing September 9, 2001 and extending through September 23, 2001.

The applicability of this proposed one-time-only change is limited to the period cited in order to allow sufficient time to complete the installation and testing of needed modifications. These modifications are needed to assure operability of 115 kV Reserve A-C Power line #3 under any combination of normal, safe shutdown, and engineered safeguards loads, as required by the licensing basis.

The signed original of the Application for Amendment to the Operating License is enclosed for filing. Attachment I contains the proposed new TS pages and Attachment II is the Safety Evaluation for the proposed changes. A markup of the affected TS pages is included as Attachment III.

Entergy Nuclear Operations, Inc.

**STATE OF NEW YORK
COUNTY OF OSWEGO**
Subscribed and sworn to before me
this ____ day of ____ 2001.

T. A. Sullivan
Vice President, Operations-JAF

Notary Public

JAFNPP

3.9 (cont'd)

B. Emergency A-C Power System

The availability of electric power shall be as specified in 3.9.A, except as specified in 3.9.B.1, 3.9.B.2, 3.9.B.3, and 3.9.B.4, except when the reactor is in the cold condition:

1. From and after the time that incoming power is available from only one line or through only one reserve station service transformer, continued reactor operation is permissible for a period not to exceed 7* days unless the line or reserve transformer is made operable earlier provided that during such 7* days both Emergency Diesel Generator Systems are operable. At the end of the 7*th day, if the condition still exists, the reactor shall be placed in a cold condition within 24 hours.
2. From and after the time that incoming power is not available from any line or through either reserve station transformer, continued reactor operation is permissible for a period not to exceed 7 days, provided that both redundant Emergency Diesel Generator Systems are operable, all core and containment cooling systems are operable and the shutdown cooling systems are operable. At the end of the seventh day, if the condition still exists, the Reactor shall be placed in a cold condition within 24 hours.

*From September 9, 2001 through September 23, 2001, with 115 KV line #3 and/or one reserve station service transformer inoperable, continued reactor operation under this condition is permissible for a period not to exceed 14 days.

4.9 (cont'd)

B. Emergency A-C Power System

1. Once each month, each pair of diesel generators which forms a redundant Emergency Diesel Generator System shall be manually initiated to demonstrate its ability to start, accelerate, and force parallel; after connection to the bus, the paralleled pair will be loaded to 5,200 KW, this load will be maintained until both generators are at steady state temperature conditions. During this period the generators' load sharing capability will be checked.
2. Once per month the diesel starting air compressors shall be checked for proper operation and their ability to recharge air receivers.

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3.9 BASES

The general objective of this specification is to assure an adequate source of electrical power to operate the auxiliary equipment during plant operation, to operate facilities to cool and lubricate the plant during shutdown, and to operate the engineered safeguards and Emergency Core Cooling Systems equipment following a loss-of-coolant accident. There are three sources of power available: namely, the normal a-c power source, the reserve a-c power source and the emergency a-c power source.

A. Normal and Reserve A-C Power Systems

1. Normal plant a-c service power is supplied from a transformer connected to the main generator. This transformer is sized to carry 100 percent of plant auxiliary loads during normal operation. This transformer is not considered as a source of shutdown power since it is not available during shutdown conditions.
2. Reserve plant a-c service power is supplied from two transformers connected to the 115 Kv transmission system. Each of these transformers is sized to: (a) carry 50 percent of the plant auxiliary loads during station startup, and as a back-up supply for the normal source of a-c power; (b) to provide for maintenance and repair of equipment while retaining redundancy of power sources; and (c) as the primary source of a-c power for the engineered safeguards and Emergency Core Cooling Systems equipment.

If one of the sources of reserve a-c power is not available the plant shall be permitted to run for 7* days provided that both emergency diesel generator systems are operable.

B. Emergency A-C Power System

Emergency a-c power is supplied from two on-site redundant Emergency Diesel Generator Systems. Each system is designed to carry the redundant engineered safeguards loads for emergency core cooling required for safe shutdown of the plant and to maintain the plant in a safe shutdown condition following a loss of coolant accident with concurrent loss of normal and reserve a-c power sources.

*From September 9, 2001 through September 23, 2001, with 115 KV line #3 and/or one reserve station service transformer inoperable, continued reactor operation under this condition is permissible for a period not to exceed 14 days.

Attachment II to JAFP-01-xxxx

SAFETY EVALUATION

**ONE-TIME-ONLY CHANGE TO THE TECHNICAL SPECIFICATIONS
REGARDING RESERVE A-C POWER ALLOWABLE OUT-OF-SERVICE TIME**

(JPTS-01-xxx)

D R A F T

**Entergy Nuclear Operations, Inc.
JAMES A. FITZPATRICK NUCLEAR POWER PLANT**

I. DESCRIPTION

This application for an amendment to the James A. FitzPatrick Technical Specifications (TS) proposes a limited duration, one time only change to Specification 3.9.B.1 and associated Bases. Specifically, this change extends the Limiting Condition for Operation (LCO) allowable out of service time for the 115kV line #3 inoperable from 7 days to 14 days during the period commencing September 9, 2001 and extending through September 23, 2001.

The applicability of this proposed one-time-only change is limited to the period cited in order to allow sufficient time to complete the installation and testing of needed modifications. These modifications are needed to assure operability of 115 kV Reserve A-C Power line #3.

The Specific changes are as follows:

Technical Specification 3.9.B.1 (page 216) and Bases for Technical Specification 3.9.B (page 223).

Add the following note qualifying the stated 7 day allowable outage time:

" From September 9, 2001 through September 23, 2001, with 115 kV line #3 and/or one reserve station service transformer inoperable, continued reactor operation under this condition is permissible for a period not to exceed 14 days."

II. PURPOSE OF THE PROPOSED CHANGE

The proposed Technical Specification change is required to complete modifications needed to assure operability of 115 kV Reserve A-C Power line #3 while minimizing associated risk. A quantitative assessment of risk associated with extending the current 7 day allowable outage time to 14 days on a one time basis indicates less risk associated with this one time extension than with the risk associated with a plant shutdown. The proposed change thus minimizes total risks.

Reserve power 115 kv line #3 was declared inoperable at 0730 hours on September 9, 2001, due to concerns regarding the capacity and capability of the line, as the sole offsite power source to maintain adequate voltage on plant 4 kV Emergency Buses 10500 and 10600 under certain design basis accident (DBA) scenarios. Specifically, with 115 kV line #4 out of service when operating at power in the RUN Mode, and in the event of a DBA loss of coolant accident (LOCA), the normal power supply for plant normal and engineered safeguards loads may be lost due to a main turbine generator trip that follows the reactor scram. When the normal plant power source is lost due to a main turbine generator trip, power is automatically transferred from the Normal Station Service Transformer (NSST) 71T-4 to Reserve Station Service Transformers (RSSTs) 71T-2 and 71T-3 which are connected to 115 kV lines #3 and #4 in the 115 kV switchyard. The plant 4 kV Emergency Buses are in turn powered from the secondary side of transformers 71T-2 and 71T-3.

Preliminary evaluation of 4 kV Emergency Bus voltage for the scenario described above

indicated that the combined loading due to non-engineered safeguard loads that remain connected to the non-Class 1E Buses 10300 and 10400 and the sequenced starting of engineered safeguard loads could result in exceeding the setpoint of the Degraded Voltage protection system. This would result in tripping the 4 kV Emergency Bus feed(s) from the offsite emergency source, with loads resequencing onto the onsite emergency source(s).

Modifications and administrative controls have been proposed that will alleviate the deficiencies described, restoring 115 kV Reserve A-C Power line #3 to operability under any combination of normal, safe shutdown, and engineered safeguards loads, as required by the licensing basis. The requested change is needed to allow adequate time for conducting and testing those modifications. Since modifications involve high energy switchyard work, an allowable outage time has been requested that will provide adequate time for careful planning and performance of the work, with allowances for inclement weather, and with due consideration for industrial safety.

The change includes conditions of both the 115 kV #3 line and/or one reserve station transformer inoperable, consistent with Specification 3.9.B.1 and as needed for the required modifications and testing.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGE

This proposed change extends the allowable outage time for one Reserve A-C Power line, specifically the 115 kV #3 line, and/or one reserve transformer from 7 days to 14 days on a one time limited basis.

Probabilistic risk assessment was performed to assess the risk significance of this one time change. The conditional core damage probability (CCDP) of continued plant operation for an additional period of 7 days (one week) with 115 kV line #3 inoperable was determined to be $1.82E-07$, which is less than the CCDP ($5E-07$) guidelines of Regulatory Guide 1.177. Further, the core damage probability (CDP) associated plant shutdown with line 3 capable of providing power for normal shutdown loads is $9.62E-07$.

Thus, the requested one time change is judged to be acceptable based on the conditional core damage probability associated with the additional 7 day period being less than the Conditional Core Damage Probability (CCDP) guidelines of Regulatory Guide 1.177 ($1.82E-07$ versus $5E-07$), and being less than the CDP associated with a normal shutdown ($1.82E-07$ versus $9.62E-07$), which would otherwise be required.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the JAF plant in accordance with the proposed amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92 since it would not:

1. Involve an increase in the probability or consequences of an accident previously evaluated.

This proposed change does not affect any accident initiating events and therefore does not increase the probability of an accident previously evaluated.

The consequences of a postulated accident occurring during the extended allowable out-of-service time are bounded by existing analyses, therefore, there is no increase in the consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not physically alter the plant or change any method in which the plant is operated. The change therefore will not create the possibility of a new or different kind of accident.

3. Involve a significant reduction in a margin of safety.

The CCDP due to this proposed change is calculated to be $1.82E-07$, which falls below the threshold probability of $1 E-6$ for risk significance of temporary changes to the plant configuration in the EPRI PSA Applications Guide (Reference 2), and below the threshold $5 E-07$ CCDP guidelines of Regulatory Guide 1.177. Therefore, the proposed change does not increase the consequences of an accident previously evaluated because the CCDP associated with the change is below that considered significant. The change will rather, result in an increased margin of safety over the alternative of conducting a plant shutdown.

V. IMPLEMENTATION OF THE PROPOSED CHANGE

Implementation of the proposed changes will not adversely affect the ALARA or Fire Protection Program at the FitzPatrick plant, nor will the changes impact the environment. The proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment need be prepared in connection with the proposed amendment.

VI. CONCLUSION

Removing one 115 kV Reserve A-C Power line from service with the plant at power is currently evaluated using the JAF full-power IPE model which assessed the resultant CDF and CCDP. As described above, the CCDP falls below the EPRI PSA Applications Guide threshold for risk significance. Further, the core damage probability (CDP)

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Attachment II to JAFP-01-xxxx
SAFETY EVALUATION
Page 4 of 4

associated with a normal plant shutdown with the #3 115 kV line capable of providing power for normal shutdown loads is $9.62E-07$. Therefore, the allowable out-of-service time extension is not considered to be risk significant.

In addition, Modifications performed will restore the capability of the #3 115 kV line resulting in improved offsite power system reliability.

The Plant Operating Review Committee (PORC) and Safety Review Committee (SRC) have reviewed this proposed change to the TS and have concluded that it does not involve a significant hazards consideration and will not endanger the health and safety of the public.

VII. REFERENCES

1. EPRI TR-105396, PSA Applications Guide, August 1995
2. JAF-RPT-MULTI-02107, Rev. 1, JAF Individual Plant Examination, April 1998
3. USNRC, "An Approach for Using Probabilistic Risk Assessment In Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis", Regulatory Guide 1.174, July 1998
4. USNRC, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", Regulatory Guide 1.177, August, 1998

Attachment III to JAFP-01-0116

MARKED-UP TECHNICAL SPECIFICATION PAGES

**ONE-TIME-ONLY CHANGE TO THE TECHNICAL SPECIFICATIONS
REGARDING RESERVE AC POWER ALLOWABLE OUT-OF-SERVICE TIME**

(JPTS-01-xxx)

D R A F T

Entergy Nuclear Operations, Inc.
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59



3.9 (cont'd)

JAFNPP

B. Emergency A-C Power System

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INSERT A

4.9 (cont'd)

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JAFNPP

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INSERT A

* From September 9, 2001 through September 23, 2001, with 115 Kt line #3 and/or one reserve station service transformer inoperable, continued reactor operation under this condition is permissible for a period not to exceed 14 days.

Insert A