

December 14, 2001

MEMORANDUM TO: William D. Beckner, Chief  
Technical Specification Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

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

SUBJECT: CLOSURE OF FITZPATRICK BEYOND SCOPE ISSUES (BSI)  
BSI-F4 AND BSI-F5 (TAC NOS. MB2521 AND MB2522)

By letter dated May 31, 2001, Entergy Nuclear Operations (the licensee) submitted plans to modify certain technical specification surveillance requirements that were beyond the scope of the James A. FitzPatrick Nuclear Power Plant (FitzPatrick) Technical Specifications conversion to the improved standard technical specification format. The NRC staff has completed its review of the subject BSIs and have determined that the proposed ITS SR 3.6.1.1, ITS SR 3.6.3.11, and the bases are acceptable. The attachments provide the necessary safety evaluations to close out the subject BSIs and TACs.

Docket No. 50-333

Attachments: As stated

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\*Safety Evaluation provided

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

IMPROVED STANDARD TECHNICAL SPECIFICATION CONVERSION

BEYOND SCOPE ISSUE (BSI)-F4

FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

1.0 INTRODUCTION

By submittal dated May 31, 2001, the licensee for the FitzPatrick Nuclear Power Plant proposed to convert their Current Technical Specifications (CTS) to the Improved Standard Technical Specifications (ITS). The licensee has identified a beyond scope issue (BSI) - F4, associated with Specification 3.6.1.1, "Primary Containment". The licensee proposed to revise ITS surveillance requirement (SR) 3.6.1.1.1 and its Bases to reflect that primary containment leak rate test and test frequency are not applicable to the Low Pressure Coolant Injection (LPCI) and Core Spray (CS) System injection line air operated testable check valves since leakage from these valves is not included in the primary containment leakage limits. ITS SR 3.6.1.3.11 specifies the leakage limits and testing frequency for the LPCI and CS testable check valves.

2.0 EVALUATION

In the LPCI and CS Systems, containment isolation is accomplished by the use of two motor-operated valves outside the containment and one air operated testable check valve inside the containment. The licensee indicated that ITS 3.6.1.1, "Primary Containment", has been revised to reflect CTS Amendment 234 dated October 4, 1996 (which implemented 10 CFR Part 50 Appendix J, Option B). The hydrostatic and pneumatic test leakage limits for the LPCI and CS System injection line air operated testable check valves were not addressed or changed by Amendment 234. CTS Amendment 40, dated November 9, 1978, established the hydrostatic and pneumatic test leakage limits for the LPCI and CS air operated testable check valves. In ITS, the leakage limits and test frequency for the LPCI and CS testable check valves are specified in ITS SR 3.6.1.3.11, "Primary Containment Isolation Valves". The staff agrees with the licensee that failure to meet the LPCI or CS system injection line air operated testable check valve leakage limit (SR 3.6.1.3.11) does not result in failure to meet ITS SR 3.6.1.1.1 because the LPCI and CS testable check valve leakage is not included in the maximum allowable leakage rate for the primary containment (La). Therefore, the proposed ITS SR 3.6.1.1.1 and Bases are revised to exclude the LPCI and CS system testable check valve testing from the primary containment leakage rate test limits and testing schedule as per CTS. The staff finds this acceptable.

The NRC staff reviewed the licensee's submittal as discussed above. In the LPCI and CS Systems containment isolation is accomplished by the use of two motor-operated valves outside

the containment and one air operated check valve inside the containment. The motor operated isolation valves are tested in accordance with the primary containment leakage rate testing (PCLRT) program. The staff finds the small increase in the test interval of LPSI and CS system air operated check valves acceptable, "in accordance with the PCLRT program" (6 months, until test results indicate additional relaxation to be acceptable). The staff agrees with the licensee that testing over a long period that has demonstrated reliability, and that other isolation methods exist to limit potential leakage. The staff also agrees that diverse instrumentation methods to detect potential leaks with the reactor building makes the proposed relaxation of the test frequency acceptable. The staff therefore, finds the proposed change acceptable.

### 3.0 CONCLUSION

Based on the above evaluation, the staff finds the proposed revision of SR for the testing frequency of LPCI and CS system air operated testable check valves from "once per 24 months" in CTS 4.7D.2.c to SRs in ITS 3.6.1.3.11 "in accordance with the primary containment leakage rate testing (PCLRT) program" acceptable.

Principal Contributor: R. Goel

Date: December 14, 2001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

IMPROVED STANDARD TECHNICAL SPECIFICATION CONVERSION

BEYOND SCOPE ISSUE (BSI)-F5

FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

1.0 INTRODUCTION

By submittal dated May 31, 2001, the licensee for the FitzPatrick Nuclear Power Plant proposed to convert their Current Technical Specifications (CTS) to the Improved Standard Technical Specifications (ITS). The licensee has identified a beyond scope issue (BSI) - F5, associated with Specification 3.6.1.3 "Primary Containment Isolation Valves (PCIVs)". The licensee proposed to revise the frequency of the surveillance requirement (SR) of CTS 4.7.D.2.c from "once per 24 months" to frequency of the surveillance requirement of ITS 3.6.1.3.11 "in accordance with the primary containment leakage rate testing (PCLRT) program" to demonstrate that the leakage rate is within limits of the Low Pressure Coolant Injection (LPCI) System and Core Spray (CS) System air operated testable check valves.

2.0 EVALUATION

The licensee indicated that the LPCI and CS air operated testable check valves have been subjected to 10 CFR Part 50, Appendix J, Type C testing (using the alternate test methods and acceptance criteria stated in CTS 4.7.D.2.c) once per 24 months since approval of CTS Amendment 40 on November 9, 1978. Under the primary containment leakage rate testing program valves subjected to Type C testing are tested once every 30 months (and the 30 months test interval may be extended to 60 months with satisfactory test performance). The licensee stated that the operating experience gained by more than 20 years of testing, as required by CTS 4.7.D.2.c and under the Inservice Test (IST) Program requirement, has demonstrated reliable operation, leak tightness, and structural integrity of the valves. The associated penetrations are normally isolated during plant operations by motor operated primary containment isolation valves. In addition, there is an additional motor operated isolation valve (which is hydrostatically leak tested under the IST program) available to isolate each penetration. Excessive leakage in an air operated testable check valve would be detected during testing of the normally closed PCIV as required by the IST program and significant leakage to the secondary containment (reactor building) would result in actuation of radiation monitors which will provide audible and visual alarms to the control room.

3.0 CONCLUSION

Based on the above evaluation, the staff finds the proposed its sr 3.6.1.1.1 and its Bases that exclude the LPCI and CS System injection line testable check valve testing from the primary containment leakage rate test limits and testing schedule acceptable because leakage from

these valves is not included in the maximum allowable leakage rate for the primary containment.

Principal Contributor: R. Goel

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