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JAFP-02-0070

T.A. Sullivan  
Vice President, Operations-JAF

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

SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
License No. DPR-59

**Proposed License Conditions Supporting the Implementation of Improved  
Standard Technical Specifications for the James A. FitzPatrick Nuclear  
Power Plant**

References: see last page of letter

Dear Sir:

In the conversion to Improved Standard Technical Specifications, Entergy Nuclear Operations, Inc. (ENO) committed to relocate certain requirements from the Current Technical Specifications to licensee controlled documents as described in References 1, 2, 3, 4, and 5. To make this commitment enforceable in accordance with an NRC request, the following license condition is requested to be issued.

The Licensee shall relocate certain Technical Specification requirements to ENO-controlled documents. Implementation of Amendment XXX shall include relocating these certain Technical Specification requirements to the appropriate documents, as described in Table LA – Removal of Details Matrix and Table R – Relocated Specifications, which are attached to the NRC's Safety Evaluation enclosed with Amendment XXX. However, the relocations to the UFSAR shall be reflected in updates completed in accordance with 10CFR 50.71(e).

As part of the overall conversion to the Improved Standard Technical Specifications, ENO is adopting numerous new and revised Surveillance Requirements (SRs). In order to facilitate implementation of these SRs, it is requested that a license condition be issued that defines the schedule for performance of the new and revised SRs during or after the implementation of the Improved Technical Specifications (ITS). The License Condition should read as follows:

The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment XXX shall be as follows:

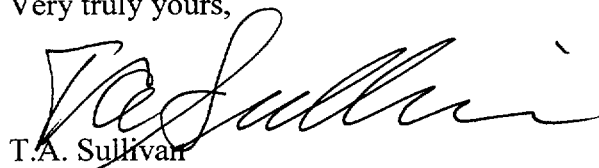
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1. For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
4. For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.

In addition, license conditions 2.C.(4) and 2.C.(5) require certain programs to be implemented. In many Standard Technical Specification plants that were licensed after JAFNPP, these two programs are required by the Administrative Controls section of the plant's Technical Specifications, and are not included as a license condition. In the Improved Standard Technical Specifications (ISTS), the program required by license condition 2.C.(4) is maintained in ISTS Section 5.5, while the program required by license condition 2.C.(5) is not maintained in the ISTS (it is allowed to be relocated to plant controlled documents). These changes are described in the Discussion of Changes for ITS Section 5.5, in the JAFNPP ITS Submittal. Therefore, the two license conditions are not necessary and JAFNPP requests their deletion.

Should you have any questions, please contact Mr. Andy Halliday at (315) 349-6055.

Very truly yours,



T.A. Sullivan  
Vice President, Operations-JAF

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## References:

1. NYPA letter, J. Knubel to USNRC Document Control Desk, Proposed Technical Specification (License Amendment) Conversion to Improved Technical Specifications (JPN-99-008), dated March 31, 1999 (TAC No. MA5049)
2. NYPA letter, J. Knubel to USNRC Document Control Desk, Revision B to Proposed Technical Specification Change (License Amendment) Conversion to Improved Standard Technical Specifications (JPN-99-018), dated June 1, 1999
3. NYPA letter, Michael J. Colomb to USNRC Document Control Desk, Revision C to Proposed Technical Specification Change (License Amendment) Conversion to Improved Standard Technical Specifications (JAFP-99-0278), dated June 1, 1999
4. ENO letter, T.A. Sullivan to USNRC Document Control Desk, Revisions D, E, F, G, and H to Proposed Technical Specification Change (License Amendment) Conversion to Improved Standard Technical Specifications (JAFP-01-0133), dated May 31, 2001
5. ENO letter, T.A. Sullivan to USNRC Document Control Desk, Revision I to Proposed Technical Specification Change (License Amendment) Conversion to Improved Standard Technical Specifications (JAFP-01-0234), dated October 18, 2001

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