



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc
James A Fitzpatrick NPP
P O Box 110
Lycoming, NY 13093
Tel 315 349 6024 Fax 315 349 6480

T.A. Sullivan
Vice President, Operations-JAF

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JAFP-02-0194

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

Subject: James A FitzPatrick Nuclear Power Plant
Docket No. 50-333
**Proposed Revision of Relief Request No. VRR-06 to the
JAFNPP In-Service Testing Program**

Dear Sir:

This submittal forwards a proposed revision to JAFNPP In-Service Testing (IST) Program Valve Relief Request VRR-06 for your review and approval. The revision corrects an erroneous citation of Technical Specifications within the body of the relief.

VRR-06R1, approved for the Third Interval JAFNPP IST Program, provides relief from the stroke time testing requirements of ASME/ANSI Code OM-10, section 4.2.1.4, for certain Service Water System valves. The basis for seeking the relief was that the valves have no position indication or manual control switches, making stroke time testing of these valves extremely difficult. The Alternate Testing section of the relief identifies alternate means by which the operational readiness of these valves is assessed and includes the fact that the valves are stroked on a periodic basis as part of the calibration of their associated control loop(s). The relief request associates Technical Specification (TS) 4.11.B.2 with the calibration for two of the valves affecting Control Room Air Conditioning, valves 70TCV-121A /B.

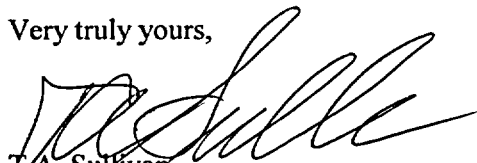
The provisions of the cited TS 4.11.B.2 are no longer a part of the JAF Technical Specifications. Amendment 239 relocated these provisions to a licensee controlled document and deleted TS 4.11.B.2. Moreover, TS 4.11.B.2 never applied to valves 70TCV-121A /B. A review conducted in accordance with the plant corrective action program determined that during the original draft of VRR-06, valves 70TCV-121 A /B were erroneously grouped with analogous valves for which TS 4.11.B.2 did apply, and that the error was not identified when these analogous valves were later deleted from the IST program. This erroneous citation was further determined not to be material to the basis for relief identified in the request. Relief is based upon the valves being stroked as part of their periodic calibration, not upon the cited Technical Specification.

The proposed revision to VRR-06 eliminates the reference to deleted TS 4.11.B.2 and provides a correct reference for the periodic control loop calibration associated with 70TCV-121A/B. The revision also identifies that the alternate testing calibrations associated with valves 70TCV-120A/B are now performed on a 48 month frequency (as determined by the plant calibration program) instead of once per cycle as previously stated.

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Attachment 1 provides a markup of existing VRR-06R1. Attachment 2 contains the revised relief request. If you have any questions, please contact Mr. John Hoddy at (315) 349-6538.

Very truly yours,



T.A. Sullivan
Vice President Operations

APPENDIX B

Valve Relief Requests

VRR-06R12

SYSTEM: SERVICE WATER/EMERGENCY SERVICE WATER

COMPONENTS: 70TCV-120A,B, 70TCV-121A,B, 67PCV-101

CATEGORY: B

CLASS: 3

FUNCTION: The normal function of the temperature control valves 70TCV-120A & B and 121A & B are modulation to limit the flow of chilled water to maintain discharge air temperature and relative humidity to maintain a temperature of 75 degrees F in the Operations Office, Control Room, and Relay Room. Moisture elements provide a control signal to keep the valves in the full open position when the relative humidity rises above 50%. The safety function of these valves is the same as above except that failure of the valve actuator mechanism results in valve movement to the maximum cooling water flow position(full open). Emergency Service Water (ESW) can also be circulated through the unit coolers if the chiller units become inoperable. The normal function of valve 67PCV-101 is to maintain a backpressure at the common service water return header for the cable tunnel and electric bay coolers. The safety function of this valve is to fail open upon the loss of air.

TEST REQUIREMENT: OM-10, Section 4.2.1.4 - stroke time for power operated valves

BASIS FOR RELIEF: These valves have no position indication or manual control switches. Valve operation is controlled by temperature switches or pressure controllers. Stroke timing these valves would be extremely difficult and require an abnormal system configuration to obtain consistent stroke time results. Performing a stroke time test of these valves is impractical without a compensating level of quality and safety.

ALTERNATE TESTING: In accordance with the guidance provided in NUREG-1482 adequate assessment of the operational readiness of these valves is achieved as follows:

Attachment 1 to JAFP-02-0194
VRR-06 markup

All valves are fail safe tested on a quarterly frequency. Prior to the test the valves are verified to not be in the full open position. During conduct of the test the valve air or electrical control is interrupted and the valve operation is observed locally to verify proper operation and movement to the fail safe full open position.

Valves 70TCV-121A,B are also stroked once per operating cycle per ~~Technical Specification 4.11.B.2~~ during the calibration of their associated instrumentation control loop *in accordance with Instrument Surveillance Procedure ISP-85.*

Valves 70TCV-120A,B are also stroked ~~once per operating cycle~~ during the calibration of their associated instrumentation control loop *on a 48 month frequency in accordance with Instrument Maintenance Procedure IMP-G8.*

APPENDIX B

Valve Relief Requests

VRR-06R2

SYSTEM: SERVICE WATER/EMERGENCY SERVICE WATER

COMPONENTS: 70TCV-120A,B, 70TCV-121A,B, 67PCV-101

CATEGORY: B

CLASS: 3

FUNCTION: The normal function of the temperature control valves 70TCV-120A & B and 121A & B are modulation to limit the flow of chilled water to maintain discharge air temperature and relative humidity to maintain a temperature of 75 degrees F in the Operations Office, Control Room, and Relay Room. Moisture elements provide a control signal to keep the valves in the full open position when the relative humidity rises above 50%. The safety function of these valves is the same as above except that failure of the valve actuator mechanism results in valve movement to the maximum cooling water flow position(full open). Emergency Service Water (ESW) can also be circulated through the unit coolers if the chiller units become inoperable. The normal function of valve 67PCV-101 is to maintain a backpressure at the common service water return header for the cable tunnel and electric bay coolers. The safety function of this valve is to fail open upon the loss of air.

TEST REQUIREMENT: OM-10, Section 4.2.1.4 - stroke time for power operated valves

BASIS FOR RELIEF: These valves have no position indication or manual control switches. Valve operation is controlled by temperature switches or pressure controllers. Stroke timing these valves would be extremely difficult and require an abnormal system configuration to obtain consistent stroke time results. Performing a stroke time test of these valves is impractical without a compensating level of quality and safety.

ALTERNATE TESTING: In accordance with the guidance provided in NUREG-1482 adequate assessment of the operational readiness of these valves is achieved as follows:

Attachment 2 to JAFP-02-0194
Proposed VRR-06R2

All valves are fail safe tested on a quarterly frequency. Prior to the test the valves are verified to not be in the full open position. During conduct of the test the valve air or electrical control is interrupted and the valve operation is observed locally to verify proper operation and movement to the fail safe full open position.

Valves 70TCV-121A,B are also stroked once per operating cycle during the calibration of their associated instrumentation control loop *in accordance with Instrument Surveillance Procedure ISP-85.*

Valves 70TCV-120A,B are stroked during the calibration of their associated instrumentation control loop *on a 48 month frequency in accordance with Instrument Maintenance Procedure IMP-G8.*