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November 12, 2002
JAFP-02-0212

T.A. Sullivan
Vice President, Operations-JAF

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-04 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-04 for your review and approval. The revision clarifies the conditions under which the identified Alternate Testing is performed.

VRR-04, approved for the Third Interval JAFNPP IST Program, currently states that [the subject valves] "will be exercised open and the pair (at least one valve) will be verified to close during cold shutdown and each refueling outage...." The Alternate Testing cited in VRR-04 requires the installation of special test equipment such that in practice, the tests are normally only performed during the extended duration of a refueling outage, as permitted by applicable codes.

The proposed revision to VRR-04 deletes the words "during cold shutdown" from the Alternate Testing identified by the relief request, making this a refueling outage test. This change is consistent with the provisions of NUREG-1482, "Guidelines for Inservice Tests at Nuclear Power Plants", section 4.1.4, which identifies the need to set up test equipment as adequate justification for deferring testing of this type until a refueling outage.

Attachment 1 provides a markup of existing VRR-04. Attachment 2 contains the revised relief request. If you have any questions, please contact Mr. John Hoddy at (315) 349-6538.

Very truly yours,

A handwritten signature in black ink that reads "for T. Sullivan".

T.A. Sullivan
Vice President Operations

A047

VRR-04

SYSTEM: HIGH PRESSURE COOLANT INJECTION (HPCI)

VALVES: 23HPI-402, 23HPI-403

CATEGORY: C

CLASS: 2 Augmented

FUNCTION: These valves open to eliminate any differential pressure that could force water from the suppression chamber into the HPCI exhaust piping when the suppression chamber pressure is greater than atmospheric. They close to prevent HPCI exhaust steam from entering the suppression chamber air space, thus bypassing the quenching action of the suppression pool.

TEST REQUIREMENT: OM-10, Section 4.3.2.2 - each check valve shall be exercised or examined in a manner which verifies obturator travel to the closed, full-open or partially open position required to fulfill its function.

BASIS FOR RELIEF: There are no position indicators on these valves or other means for verifying valve closure, thus the only practical means of verifying closure is to perform a back-leakage test. Since the valves are installed in series with no intermediate test tap, verifying the each individual valve closes is not practical.

To perform the specified safety function in the closed direction, only one valve of the pair needs to close. Thus in accordance with NUREG-1482 Section 4.1.1, verifying that either valve closes is adequate to demonstrate reliable operation of the pair.

ALTERNATE TESTING: These valves will be exercised open and the pair (at least one valve) will be verified to close during ~~cold shutdown~~ and each refueling outage in accordance with OM-10 Section 4.3.2.2(f) and (g). In accordance with NUREG-1482, if the closure test of the pair of valves fails, then corrective action will be applied to both valves prior to returning the system to operability.

Attachment 2 to JAFP-02-0212
Proposed VRR-04R1

VRR-04R1

SYSTEM: HIGH PRESSURE COOLANT INJECTION (HPCI)

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ALTERNATE TESTING: These valves will be exercised open and the pair (at least one valve) will be verified to close during each refueling outage in accordance with OM-10 Section 4.3.2.2(f) and (g). In accordance with NUREG-1482, if the closure test of the pair of valves fails, then corrective action will be applied to both valves prior to returning the system to operability.