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February 27, 2003
JAFP-03-0034

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

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Proposed License Amendment to Eliminate the Requirements for the Post Accident Sampling System (PASS)
Using the Consolidated Line Item Improvement Process

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) is submitting a request for an amendment to the Technical Specifications (TS) for the James A. FitzPatrick Nuclear Power Plant (JAFNPP).

The proposed license amendment would delete TS 5.5.3, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the post accident sampling system (PASS) at JAFNPP. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)" dated August 2001. The availability of this TS improvement was announced in the Federal Register on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases pages marked-up to show the proposed change (for information only).

ENO requests approval of the proposed license amendment by March 30, 2004 with the amendment being implemented within sixty days following approval.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated New York State official.

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If you should have any questions regarding this submittal, please contact Mr. Andrew Halliday at (315) 349-6055.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on this the 27th day of February 2003.

Very truly yours,

T. A. Sullivan
Vice President Operations

Attachments:
1. Description and Evaluation
2. Proposed Technical Specification Changes (Mark-up)
3. Proposed Technical Specification Pages (Retyped)
4. Regulatory Commitments
5. Draft Changes to Technical Specification Bases Pages

cc: Regional Administrator, Region I
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ATTACHMENT 1 to JAFP-03-0034

Description and Evaluation of
Proposed Amendment to Technical Specifications

Description and Evaluation of
Proposed Amendment to Technical Specifications

1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of Technical Specification (TS) 5.5.3, "Post Accident Sampling." The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)" dated August 2001. The availability of this TS improvement was announced in the *Federal Register* on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

2.0 EVALUATION

2.1 Applicability of Published Safety Evaluation

Entergy Nuclear Operations, Inc. (ENO) has reviewed the safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. This verification included a review of the NRC staff's evaluation (as modified slightly by the notice of availability dated March 20, 2002) as well as the supporting information provided to support TSTF-413 (i.e., NEDO-32991, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). ENO has concluded that the justifications presented in the TSTF and the safety evaluation prepared by the NRC staff are applicable to the James A. FitzPatrick Nuclear Power Plant (JAFNPP) and justify this amendment for the incorporation of the changes to the JAFNPP TS.

2.2 Optional Changes and Variations

ENO is not proposing any variations or deviations from the technical specification changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001 (as modified slightly by the notice of availability dated March 20, 2002) with the exception of the TS Bases. As described in Attachment 5, changes to the JAFNPP TS Bases are not required.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

ENO has reviewed the proposed no significant hazards consideration determination published on December 27, 2001 (66 FR 66949) as part of the CLIIP. ENO has concluded that the proposed determination presented in the notice is applicable to JAFNPP and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the model SE published in the *Federal Register* on December 27, 2001 (as modified slightly by the notice of availability dated March 20, 2002) for this TS improvement, plant-specific verifications and commitments were performed as follows:

1. ENO is making a regulatory commitment to develop and maintain contingency plans for obtaining and analyzing highly radioactive samples from the Reactor Coolant System, suppression pool, and containment atmosphere. The contingency plans will be contained in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold will be established and maintained for JAFNPP at radioactivity levels of 300 microcuries/cc dose equivalent iodine. This capability will be described in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

3. ENO is making a regulatory commitment to develop and maintain an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines will be maintained in plant procedures. Implementation of this commitment will be completed within 6 months after the implementation of the License amendment. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. ENO has Concluded that the staff's findings presented in that evaluation are applicable to JAFNPP and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2 to JAFP-03-0034

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling, and Standby Gas Treatment. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at 24 month intervals or less.

Not used.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the 24 month Frequency for performing integrated leak test activities.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

(continued)

ATTACHMENT 3 to JAFP-03-0034

PROPOSED TECHNICAL SPECIFICATION PAGES (RETYPED)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling, and Standby Gas Treatment. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at 24 month intervals or less.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the 24 month Frequency for performing integrated leak test activities.

5.5.3 Not Used

(continued)

ATTACHMENT 4 to JAFP-03-0034

SUMMARY OF REGULATORY COMMITMENTS

ATTACHMENT 4 to JAFP-03-0034

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by ENO in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Andrew Halliday at (315) 349-6055.

Commitment ID Number	Description	ACT Item Due Date
JAFP-03-0034-1	Develop and maintain contingency plans for obtaining and analyzing highly radioactive samples from the Reactor Coolant System, suppression pool, and containment atmosphere. The contingency plans will be contained in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.	Within 6 months after implementation of amendment
JAFP-03-0034-2	The capability for classifying fuel damage events at the Alert level threshold will be established and maintained for JAFNPP at radioactivity levels of 300 microcuries/cc dose equivalent iodine. This capability will be described in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	Within 6 months after implementation of amendment
JAFP-03-0034-3	Develop and maintain an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines will be maintained within plant procedures. Implementation of this commitment will be completed within 6 months after the implementation of the License amendment. The capability to monitor radioactive iodines is considered a regulatory commitment.	Within 6 months after implementation of amendment

ATTACHMENT 5 to JAFP-03-0034

DRAFT CHANGES TO TECHNICAL SPECIFICATION BASES PAGES

No changes to the TS Bases are necessary. Changes to the TS Bases shown in TSTF-413, Revision 0 for NUREG-1433 (BWR/4 STS) are not applicable to JAFNPP. The changes to NUREG-1433, Bases 3.3.3.1, Required Action D.1 shown in the TSTF are not applicable because NUREG-1433 Bases 3.3.3.1 Required Action D.1 was not retained as part of the conversion of the JAFNPP TS to "improved" TS (approved as TS Amendment 274).