Entergy

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June 22, 2004
JAFP-04-0087

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Application for Technical Specification (TS) Improvement to Eliminate Requirements for Hydrogen/Oxygen Monitors Using the Consolidated Line Item Improvement Process (CLIIP)

Dear Sir:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) hereby requests an amendment to the Technical Specifications (TS) for the James A. FitzPatrick Nuclear Power Plant.

The proposed amendment will delete the FitzPatrick TS requirements related to the hydrogen/oxygen monitors. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the *Federal Register* on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

Post-accident hydrogen recombiners are not installed at FitzPatrick. Consequently, that portion of the CLIIP will not be requested in this proposed amendment.

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment 2 provides the existing TS pages marked-up to show the proposed changes and associated Bases changes. The Bases changes are provided for information only. Attachment 3 provides revised, clean TS pages. Attachment 4 is a summary of regulatory commitments. Implementation of TSTF-447 also involves various changes to the TS Bases. The TS Bases changes will be submitted with a future update in accordance with TS 5.5.11, "Technical Specifications (TS) Bases Control Program."

A001

ENO requests approval of the proposed License Amendment by June 1, 2005, with the amendment being implemented within 60 days from the date of 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.

The commitments made in this letter are contained in Attachment 4. If you have any questions, please contact Mr. Andrew Halliday, Manager, Regulatory Compliance at 315-349-6055.

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

Executed on the 22 day of June, 2004

Nancy B. Czerow

NANCY B. CZEROW
Notary Public, State of New York
Qualified in Oswego County #4884611
Commission Expires 1-26-07

Sincerely,

T. A. Sullivan
Site Vice President

Attachments:

1. Application for Technical Specification Improvement to Delete the TS Requirements for the Hydrogen/Oxygen Analyzers Using the Consolidated Line Item Improvement Process - Description and Assessment

2. Application for Technical Specification Improvement to Delete the TS Requirements for the Hydrogen/Oxygen Analyzers Using the Consolidated Line Item Improvement Process - Technical Specification and Bases Marked-up Pages

3. Application for Technical Specification Improvement to Delete the TS Requirements for the Hydrogen/Oxygen Analyzers Using the Consolidated Line Item Improvement Process - Technical Specification Pages

4. Application for Technical Specification Improvement to Delete the TS Requirements for the Hydrogen/Oxygen Analyzers Using the Consolidated Line Item Improvement Process – Summary of Regulatory Commitments

cc: Next page

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Attachment 1 to JAFP-04-0087
Entergy Nuclear Operations, Inc. – FitzPatrick
Docket No. 50-333

APPLICATION FOR TECHNICAL SPECIFICATION (TS) IMPROVEMENT TO DELETE THE TS REQUIREMENTS FOR THE HYDROGEN/OXYGEN ANALYZERS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

DESCRIPTION AND ASSESSMENT

(3 sheets)

Attachment 1 to JAFP-04-0087
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Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes references to the hydrogen and oxygen analyzers in Technical Specifications (TS) sections SR 3.3.3.1 ("Post Accident Monitoring Instrumentation") and Table 3.3.3.1-1 ("Post Accident Monitoring Instrumentation"). The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003.

The changes are consistent with Revision 1 of NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the *Federal Register* on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC approved Revision 1 of TSTF-447, the proposed TS changes include:

LCO 3.3.3.1	Delete NOTE (Reference to Function 8 in Table 3.3.3.1-1	Deleted
SR 3.3.3.1.2	Delete section (PAM Primary Containment H2 and O2 surveillance requirements.)	Deleted
SR 3.3.3.1.3	Delete exception for H2 and O2 monitors. Renumber subsequent sections to reflect deletion of SR 3.3.3.1.2.	Revised
Table 3.3.3.1-1	Delete item 8 (Primary Containment H2 & O2 Concentration). Renumber subsequent items.	Revised
LCO BASES 3.3.3.1	Delete item 8 (Primary Containment H2 & O2 Concentration). Renumber subsequent items.	Revised
BASES SR 3.3.3.1.2 and 3.3.3.1.3	Delete reference to H2 and O2 concentration channels. Delete SR 3.3.3.1.3 from section title.	Revised

Post-accident hydrogen recombiners are not installed at FitzPatrick. Consequently, that portion of the CLIIP has not been addressed in this proposed amendment.

Description and Assessment

- ENO has verified that a hydrogen monitoring system (hydrogen analyzers) capable of diagnosing beyond design-basis accidents is installed at FitzPatrick and is making a regulatory commitment to maintain that capability (to the level of Regulatory Guide 1.97, Category 3).

- FitzPatrick has an inerted containment. ENO has verified that an oxygen monitoring system (oxygen analyzers) capable of verifying the status of the inerted containment is installed at FitzPatrick and is making a regulatory commitment to maintain that capability (to the level of Regulatory Guide 1.97, Category 2).

- The hydrogen and oxygen monitoring capabilities will be maintained in the Technical Requirements Manual (TRM). This document will be revised, as appropriate, to reflect the license amendment.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

ENO has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIIP. ENO has concluded that the proposed determination presented in the notice is applicable to FitzPatrick and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on September 25, 2003 (68 FR 55416) as part of the CLIIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to FitzPatrick and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. ENO is not proposing variations or deviations from the TS changes described in TSTF-447, Rev. 1, or the NRC staff's model safety evaluation, published on September 25, 2003 (68 FR 55416).

10.0 REFERENCES

1. Federal Register Notice, "Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process," published September 25, 2003 (68 FR 55416).

Attachment 2 to JAFP-04-0087
Entergy Nuclear Operations, Inc. – FitzPatrick
Docket No. 50-333

APPLICATION FOR TECHNICAL SPECIFICATION (TS)

IMPROVEMENT TO DELETE THE TS REQUIREMENTS

FOR THE HYDROGEN/OXYGEN ANALYZERS USING THE

CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

TECHNICAL SPECIFICATION AND BASES MARKED-UP PAGES
(8 sheets)

TS PAGES

3.3.3.1-1
3.3.3.1-3
3.3.3.1-4

BASES PAGES

B 3.3.3.1-6
B 3.3.3.1-7
B 3.3.3.1-8
B 3.3.3.1-11
B 3.3.3.1-12

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

~~NOTE~~
~~Function 8 may be inoperable for up to 3 hours per 24 hour period during Post Accident Sampling System operation.~~

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES
1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two required channels inoperable.	C.1 Restore one required channel to OPERABLE status.	7 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
~~SR 3.3.3.1.2~~	~~Perform CHANNEL CALIBRATION of each required PAM Primary Containment H_2 and O_2 Concentration Function channel.~~	~~92 days~~
SR 3.3.3.1.2	Perform CHANNEL CALIBRATION of each required PAM instrumentation channel ~~except for the Primary Containment H_2 and O_2 Concentration Function channels.~~	24 months

Table 3.3.3.1-1 (page 1 of 1)
Post Accident Monitoring Instrumentation

	FUNCTION	REQUIRED CHANNELS	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1
1.	Reactor Vessel Pressure	2	E
2.	Reactor Vessel Water Level		
	a. Fuel Zone	2	E
	b. Wide Range	2	E
3.	Suppression Pool Water Level (Wide Range)	2	E
4.	Drywell Pressure		
	a. Narrow Range	2	E
	b. Wide Range	2	E
5.	Containment High Range Radiation	2	F
6.	Drywell Temperature	2	E
7.	Penetration Flow Path PCIV Position	2 per penetration flow path (a)(b)	E
~~8.~~	~~Primary Containment H_2 & O_2 Concentration~~	~~2~~	~~E~~
8. ~~9.~~	Suppression Chamber Pressure	2	E
9. ~~10.~~	Suppression Pool Water Temperature	2	E
10. ~~11.~~	Drywell Water Level	2	E

(a) Not required for isolation valves whose associated penetration flow path is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.

BASES

LCO

7. Primary Containment Isolation Valve (PCIV) Position (continued)

lamps for active PCIVs (check valves and manual valves are not required to have position indication). These position switches and associated indicators in the control room provide the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with these portions of the instrument channel.

8. Primary Containment Hydrogen and Oxygen Concentration

Primary containment hydrogen and oxygen concentration is a Category 1 variable provided to detect high hydrogen or oxygen concentration conditions that represent a potential for containment breach. This variable is also important in verifying the adequacy of mitigating actions. The primary containment hydrogen and oxygen concentration channels consists of two redundant analyzers. Each analyzer contains a hydrogen and an oxygen detector. Each analyzer can be aligned to sample air from one of four sample points (3 points in the drywell and 1 point in the suppression chamber). Sample air passes through the hydrogen analyzer and the oxygen analyzer and is returned to the suppression chamber air space. During normal operation, the Division I analyzer samples the suppression chamber and the Division II analyzer samples the drywell. The analyzers are capable of determining oxygen and hydrogen concentrations in the range of 0% to 30%, which meets the requirements of Reference 1. The hydrogen and oxygen concentration from each analyzer may be displayed on its associated recorder in the relay room. Therefore, the PAM Specification deals specifically with these portions of the instrument channel. A Note allows the primary containment hydrogen and oxygen concentration channels to be inoperable for up to 3 hours per 24 hour period during Post Accident Sampling System (PASS) operation. PASS operation includes realignment from or to the mode. Operation of the PASS may require isolation of the primary containment hydrogen and oxygen concentration channels. This allowance will ensure that the PASS can perform its post accident monitoring function (Ref. 4) while minimizing the time the primary containment hydrogen and oxygen concentration channels are isolated.

(continued)

BASES

LCO (continued)

8. ~~8.~~ Suppression Chamber Pressure

Suppression chamber pressure is a Category 1 variable provided to verify RCS and containment integrity and to verify the effectiveness of ECCS actions taken to prevent containment breach. Two suppression chamber channels monitor a range from -15 psig to +85 psig. Each channel consists of an independent transmitter and associated recorder in the control room. These transmitters and recorders provide the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with these portions of the instrument channel.

9. ~~10.~~ Suppression Pool Water Temperature

Suppression pool water temperature is a Category 1 variable provided to detect a condition that could potentially lead to containment breach and to verify the effectiveness of ECCS actions taken to prevent containment breach. The suppression pool water temperature instrumentation allows operators to detect trends in suppression pool water temperature. The suppression pool water temperature is monitored by two redundant channels. Each channel consists of sixteen resistance temperature detectors (RTDs) that monitor temperature over a range of 30°F to 230°F. The RTDs are mounted in thermowells spaced at equal intervals around the periphery of the suppression pool. The sixteen RTD signals are averaged and the resulting bulk temperature signal is sent to redundant indicating recorders in the control room. A minimum of fifteen out of sixteen RTDs are required for channel operability. An evaluation (Ref. 5) demonstrates that the maximum error in suppression pool bulk temperature measurement including channel uncertainty is < 4°F with active pool circulation. Thus a 4°F bias has been employed for conservatism. By specifying 15 RTDs the single failure criteria is accounted for. This evaluation conservatively assumed the failure of RTDs at locations that minimized indicated bulk suppression pool temperature and consequently maximized indicated error. These RTDs and recorders provide the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with these portions of the instrument channels.

(continued)

BASES

LCO (continued)

10. ~~11.~~ Drywell Water Level

Drywell Water Level is a Category 1 variable provided to detect whether plant safety functions are being accomplished. Two drywell water level channels monitor the range from 22 feet to 106 feet. Each drywell water level channel consists of level transmitters, with an associated indicator and recorder in the control room. These level transmitters and associated indicators and recorders provide the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with these portions of the instrument channel.

APPLICABILITY

The PAM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1 and 2. In MODES 3, 4, and 5, plant conditions are such that the likelihood of an event that would require PAM instrumentation is extremely low; therefore, PAM instrumentation is not required to be OPERABLE in these MODES.

ACTIONS

Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to diagnose an accident using alternative instruments and methods, and the low probability of an event requiring these instruments.

Note 2 has been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the other required channel in the associated Function is OPERABLE. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. The 6 hour testing allowance is acceptable since it does not significantly reduce the probability of properly monitoring post-accident parameters, when necessary.

SR 3.3.3.1.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel against a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. For the PCIV Position Function, the CHANNEL CHECK consists of verifying the remote indication conforms to expected valve position.

Channel agreement criteria are determined by the plant staff, based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency of 31 days is based upon plant operating experience, with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel of a given Function in any 31 day interval is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of those displays associated with the channels required by the LCO.

SR 3.3.3.1.2 ~~and SR 3.3.3.1.3~~

This ~~These~~ SR~~s~~ require a CHANNEL CALIBRATION to be performed. CHANNEL CALIBRATION is a complete check of the instrument

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.3.1.2 ~~and SR 3.3.3.1.3~~ (continued)

loop, including the sensor. The test verifies the channel responds to measured parameter with the necessary range and accuracy. For the PCIV Position Function, the CHANNEL CALIBRATION consists of verifying the remote indication conforms to actual valve position.

~~The 92 day Frequency for CHANNEL CALIBRATION of the Primary Containment Hydrogen and Oxygen Concentration channels is based on vendor recommendations.~~ The 24 month Frequency for CHANNEL CALIBRATION of ~~all other~~ PAM instrumentation of Table 3.3.3.1-1 is based on operating experience and consistency with the refueling cycles.

REFERENCES

1. Regulatory Guide 1.97, Revision 3, Instrumentation For Light-Water-Cooled Nuclear Power Plants To Assess Plant And Environs Conditions During And Following An Accident, May 1983.

2. NRC letter, H. I. Abelson to J. C. Brons dated March 14, 1988, regarding conformance to Regulatory Guide 1.97, Rev. 2. Includes NRR Safety Evaluation Report for Regulatory Guide 1.97 and James A. FitzPatrick Nuclear Power Plant.

3. 10 CFR 50.36(c)(2)(ii).

4. UFSAR, Section 9.14.4.

5. DRF-T23-688-1, Error in FitzPatrick Temperature Measurement Based on Monticello In-plant S/RV Test Data.

Attachment 3 to JAFP-04-0087
Entergy Nuclear Operations, Inc. – FitzPatrick
Docket No. 50-333

APPLICATION FOR TECHNICAL SPECIFICATION (TS)

IMPROVEMENT TO DELETE THE TS REQUIREMENTS

FOR THE HYDROGEN/OXYGEN ANALYZERS USING THE

CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

TECHNICAL SPECIFICATION PAGES
(3 sheets)

TS PAGES

3.3.3.3-1
3.3.3.1-3
3.3.3.1-4

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

----------NOTES----------
1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two required channels inoperable.	C.1 Restore one required channel to OPERABLE status.	7 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.3.1.2	Perform CHANNEL CALIBRATION of each required PAM instrumentation channel.	24 months

Table 3.3.3.1-1 (page 1 of 1)
Post Accident Monitoring Instrumentation

FUNCTION	REQUIRED CHANNELS	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1
1. Reactor Vessel Pressure	2	E
2. Reactor Vessel Water Level		
a. Fuel Zone	2	E
b. Wide Range	2	E
3. Suppression Pool Water Level (Wide Range)	2	E
4. Drywell Pressure		
a. Narrow Range	2	E
b. Wide Range	2	E
5. Containment High Range Radiation	2	F
6. Drywell Temperature	2	E
7. Penetration Flow Path PCIV Position	2 per penetration flow path (a)(b)	E
8. Suppression Chamber Pressure	2	E
9. Suppression Pool Water Temperature	2	E
10. Drywell Water Level	2	E

(a) Not required for isolation valves whose associated penetration flow path is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.

Attachment 4 to JAFP-04-0087
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Docket No. 50-333

APPLICATION FOR TECHNICAL SPECIFICATION (TS)

IMPROVEMENT TO DELETE THE TS REQUIREMENTS

FOR THE HYDROGEN/OXYGEN ANALYZERS USING THE

CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

SUMMARY OF REGULATORY COMMITMENTS
(1 page)

Attachment 4 to JAFP-04-0087
Entergy Nuclear Operations, Inc. – FitzPatrick
Docket No. 50-333

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.

SUMMARY OF REGULATORY COMMITMENTS

Commitments	Description	Completion Schedule
JAFP-04-0087-01	The drywell hydrogen monitoring system will maintain the capability of diagnosing beyond design-basis accidents (to the level of Regulatory Guide 1.97, Category 3).	60 days from the date of approval of the proposed amendment.
JAFP-04-0087-02	The drywell oxygen monitoring system will maintain the capability of verifying the status of the inerted containment (to the level of Regulatory Guide 1.97, Category 2).	60 days from the date of approval of the proposed amendment.
JAF-04-0087-03	The drywell hydrogen and oxygen monitoring capabilities will be maintained in the Technical Requirements Manual. This document will be revised, as appropriate, to reflect the license amendment.	60 days from the date of approval of the proposed amendment.