



John C. Brons
Senior Vice President
Nuclear Generation

July 17, 1985
JPN-85-57
IPN-85-37

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Implementation of Integrated Schedules for
Plant Modifications (Generic Letter 85-07)

- Reference:
1. NRC Generic Letter 85-07 dated May 2, 1985 regarding the same subject.
 2. NYPA letter, J. C. Brons to D. B. Vassallo, dated June 14, 1985, (JPN-85-47) regarding Integrated Implementation Schedule of SPDS and ATWS Rule Modifications.
 3. NYPA letter, J. C. Brons to D. B. Vassallo, dated June 28, 1985 (JPN-85-53) regarding Regulatory Guide 1.97 Post-Accident Instrumentation Modification.

Dear Sir:

In response to Reference 1, the Authority's position concerning development and implementation of a comprehensive Integrated Living Schedule (ILS) for the James A. FitzPatrick and Indian Point 3 Plants is described in detail in Attachment 1. The Authority believes that the ILS is an excellent tool which will provide valuable assistance for long term planning at JAF and IP-3. We intend to work with the staff to develop an ILS for JAF within approximately one year. However, as described in Attachment 2, and summarized below, the Authority has concerns about the implementation of the ILS.

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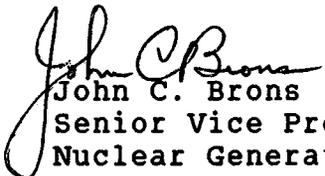
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The Authority strongly believes that the ILS dates should not be implemented by Order or license condition.

The incorporation of ILS dates into the Operating License or an Order would not allow the Authority to readily adjust the ILS to account for the imposition of new NRC regulatory requirements. This is a significant concern to the Authority since the imposition of a new requirement could make the Authority unable to meet ILS commitments. The Authority considers a semi-annual ILS update report adequate for the NRC to verify that good faith efforts are being made to meet ILS commitments. This report would identify any schedule changes and provide justification for schedular extensions.

The Authority proposes that a meeting be held with the NRC staff to discuss these concerns and our plans for an ILS. Please contact Messrs. J. A. Gray, Jr. (JAF) and P. Kokolakis (IP-3) of my staff concerning this matter.

Very truly yours,


John C. Brons
Senior Vice President
Nuclear Generation

cc: Office of the Resident Inspector
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Attachment I to
JPN-85-57, IPN-85-37

Response to Generic Letter 85-07
Concerning Implementation Of
Integrated Schedules for
Plant Modifications

New York Power Authority
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point Unit 3 Nuclear Power Plant
Docket No. 50-286

NRC Response Format - Generic Letter 85-07

Plant Name: James A. FitzPatrick
Utility: New York Power Authority
Docket No. 50-333

I. Intentions

- A. Intend to work with the staff to develop an ILS
(But have reservations that must be resolved;
see Attachment II) X
- B. Have reservations that must be resolved before
developing ILS
- C. Do not presently intend to negotiate an ILS
with the staff
- D. Plant to implement an informal ILS only

II. Status

A. If you answered I.A above:

- 1. Have you settled on a method for prioritizing
the work at you plant(s)?

Circle One: Yes No

If yes, select best description:

- Engineering judgement
- Analytic Hierarchy process
- Risk based analysis
- Cost-benefit analysis
- Other (please describe)

If no, provide estimated date
for selecting a methodology: 2/86
Date

or

If not presently available, provide estimated
date for scheduling the selection of a
methodology:

- 2. What is your estimated date for making a
submittal to the NRC Mid 1986

or

If not presently available, planned date for
scheduling a submittal to the NRC

B. If you answered I.B above:

1. Please explain your reservations on separate sheets(s) or provide your schedule for supplying an explanation

See separate sheet(s) _____

or

Separate submittal schedule for _____

_____ Date

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time fram for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. Additional Items

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

(See Attachment II)

NRC Response Format - Generic Letter 85-07

Plant Name: Indian Point 3

Utility: New York Power Authority
Docket No. 50-286

I. Intentions

- A. Intend to work with the staff to develop an ILS
(But have reservations that must be resolved;
see Attachment II) X
- B. Have reservations that must be resolved before
developing ILS _____
- C. Do not presently intend to negotiate an ILS
with the staff _____
- D. Plant to implement an informal ILS only _____

II. Status

A. If you answered I.A above:

1. Have you settled on a method for prioritizing
the work at you plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date
for selecting a methodology: 6/86
Date

or

If not presently available, provide estimated
date for scheduling the selection of a
methodology: _____

2. What is your estimated date for making a
submittal to the NRC 9/86

or

If not presently available, planned date for
scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheets(s) or provide your schedule for supplying an explanation

See separate sheet(s) _____

or

Separate submittal schedule for _____

Date _____

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time fram for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. Additional Items

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

(See Attachment II)

Attachment II to
JPN-85-57, IPN-85-37

Response to Generic Letter 85-07 Items

New York Power Authority
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point Unit 3 Nuclear Power Plant
Docket No. 50-286

Response to Generic Letter 85-07 Items

Item I.A

NRC Question: Explain reservations that must be resolved before developing an Integrated Living Schedule (ILS).

NYPA Response: The proposed ILS can be beneficial in enabling the Authority to implement NRC required modifications such as EPIC, NUREG-0737 items, Reg. Guide 1.97, SPDS, ATWS Rule, etc. in an orderly and safe manner. However, once ILS dates are incorporated into "license-condition" or "order," any significant new NRC requirements may overextend the Authority's finite resources. New requirements can be very significant in terms of the amount of time, manpower, and financial resources needed for their implementation.

Any ILS program must take into consideration the imposition of new or modified NRC requirements. New tasks must be individually evaluated in terms of their effects on the current schedule (i.e., priority, time, manpower, and financial resources). The ILS program must also accommodate changes to the schedule, without requiring license amendments, exemptions or changes to orders, in the event that certain requirements can not be accomplished under the old schedule due to circumstances beyond the Authority's control.

For example, in our June 14, 1985 letter concerning JAF (Reference 2) the Authority accelerated the installation of the SPDS/EPIC modifications and pushed back ATWS rule-related modifications by one fuel cycle, thereby alleviating their combined impact on the Authority's resources. Another example is the Authority's efforts to combine the installation of Regulatory Guide 1.97 item No. 1 (Reference 3) with the Reactor Vessel Water Level Instrumentation (Generic Letter 84-23). Similarly at IP-3 the ATWS and Regulatory Guide 1.97 modifications are being scheduled for the cycle 5/6 refueling outage. One reason for this schedule is the amount of work which is planned for the cycle 4/5 refueling outage. These and other schedule changes allow the Authority to improve schedules, reduce the the amount of duplicate work, and allocate resources to other modifications. Inclusion of ILS dates in the Operating License or Orders effectively removes flexibility which is consistent with good management.

The Authority also notes that no guidance has been established regarding the amount of information or the level of detail required from licensees to support a schedular exemption or a license amendment concerning an ILS requirement. This may lead to unnecessarily detailed or extensive submittal of information to the NRC. In addition, a "Sholly Notice" is required for each exemption or license amendment.

The Authority strongly believes that ILS dates should not be implemented by Order or license condition. Instead, the Authority would report its progress on ILS items to the NRC semi-annually. This report would identify any schedule changes and provide justification for any schedular extensions. The Authority considers a reporting mechanism of this type adequate to allow the NRC to verify that good faith efforts are made to meet ILS commitments.

III. Additional Items

NRC Question: Please make any suggestions you may have as to how a utility sponsored project might be credited for plant safety enhancement.

NYPA Response: The Authority is presently installing many NRC-initiated and self-imposed plant modifications in order to continue safe, reliable, and economic operation. As part of our continuing efforts to accomplish this task, many self-imposed plant modifications should be credited towards NRC-issued plant safety enhancements.

The installation of the Analog Transmitter Trip System (ATTS) at JAF is an example of a typical plant safety enhancement project that should be credited towards NRC-initiated requirements such as NUREG-0737 item II.K.3.16, "Reduction of Challenges and Failures of Safety/Relief Valves". This modification has improved plant availability/reliability, simplified calibration procedures, and enhanced plant safety.

The ATTS is an all solid-state electronic trip system designed to provide stable and accurate monitoring of protection parameters. Previously the plant utilized direct acting, pressure, differential pressure, and water level switches as input into the reactor protection, main steam line isolation, and emergency core cooling systems. Technical specifications for this type of process sensor typically require surveillance testing once a month while the plant is at power. In the past, during the monthly

surveillance tests, errors have caused scrams and challenges to safety/relief valves, reactor protection system and/or engineered safety features. The ATTS modification has reduced the potential for reactor scrams resulting from procedural and physical errors during surveillance tests, and thereby reduced the potential for S/RV and RPS challenges.

The Authority believes that credit should also be provided for utility sponsored projects concerning balance of plant type modifications. In some cases balance of plant modifications are a very significant factor in the continued operation of a nuclear power plant. As an example, at IP-3 the Authority is currently performing balance of plant modifications aimed primarily at improving secondary water chemistry. These modifications include replacement of copper components in the condensate/feedwater heaters and moisture separator reheaters, condenser improvements, and continuation of the installation of the condensate polisher. It is believed that the incorporation of the improved secondary water chemistry will enhance the operation of IP-3.