

POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE NEW YORK, N. Y. 10019

(212) 397-6200

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December 16, 1980  
JPN-80-58

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

Attention: Mr. Thomas A. Ippolito, Chief  
Operating Reactors Branch No. 2  
Division of Licensing

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Post TMI Requirements

- References: 1) NRC letter, D. G. Eisenhut to All Licensees of Operating Reactors and Applicants of Operating Licenses and Holders of Construction Permits dated October 31, 1980  
2) PASNY letter, J.P. Bayne to D.G. Eisenhut (JPN-80-55), dated December 5, 1980  
3) PASNY letter, J.P. Bayne to T.A. Ippolito (JPN-80-29), dated June 13, 1980  
4) NRC letter, T.A. Ippolito to G.T. Berry dated July 18, 1980  
5) PASNY letter, J.P. Bayne to T.A. Ippolito (JPN-80-38), dated August 4, 1980

Dear Sir:

This letter is submitted in response to Reference 1 which transmitted NUREG-0737 "Clarification of TMI Action Plan Requirements". We have reviewed the subject document for the FitzPatrick plant and provide the following information:<sup>(1)</sup>

Regarding Item 1.A.1.3, "Shift Manning", compliance with this requirement necessitates an action plan for hiring and training of additional personnel which requires a minimum of 100 weeks to complete. Therefore, the required shift staff will not be

(1) This letter is based on the Authority's review of the unbond version of NUREG-0737 attached to Reference 1.

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available until approximately November, 1982. Detailed justification for this delay has been previously provided in Reference 2.

Item II.E.4.2, "Containment Isolation Dependability", is currently undergoing review by the Authority's engineering staff. It is not expected that the modification in accordance with Attachment 1, Item 2(b), of this issue will be completed by January 1, 1981. Also, in lieu of sealing close the containment purge valves as noted in Position 6, the appropriate switches for overriding safety actuation signals are tagged and under administrative control such that the Authority will request approval from the NRC prior to blocking the isolation signal. This approach was previously submitted in Reference 3 and additional details will be provided in response to Reference 4. With respect to a high radiation isolation signal, it is hereby requested that the NRC clarify the type of signal to be utilized to isolate the purge valves. Currently, the JAF design has the capability of isolating the containment purge valves upon a secondary containment high radiation signal.

Many of the NUREG 0737 items are subjects for actions by the G.E./BWR Owners Group of which the Authority is a member. These items involve analyses, engineering and testing, the results of which may have an impact on meeting the implementation schedules. For example, implementation of item II.D.1, "Relief and Safety Valve Test Requirements", is dependent upon successful completion of the SRV tests being conducted generically by a contractor through the G.E./BWR Owners Group. Any difficulties encountered with the testing program, although none are currently anticipated, may prevent meeting the required schedule. Other examples of such items are II.B.4, "Training for Mitigating Core Damage", II.F.2, "Instrumentation for Detection of Inadequate Core Cooling".

In some cases the equipment will be installed and considered operable even though the qualifications are yet to be completed. This is the case with Item II.D.3, "Valve Position Indication". The direct position indication system for the safety relief valves has been installed and is considered operable, as noted in Reference 5. However, at the time this requirement was

due, equipment in conformance with the qualification requirements was unavailable. The effort of qualifying this equipment is continuing and is not expected to be completed until approximately June , 1981.

For Item II.E.4.1, "Dedicated Hydrogen Penetrations", the Authority is currently in the process of providing dedicated hydrogen penetrations in accordance with the required schedule. However, some difficulty has been encountered in obtaining the required qualified equipment (valves and valve operators) and the implementation deadline may not be met.

As previously agreed with your staff, Technical Specifications are not required until such time as additional clarifications are issued by the NRC.

It is the Authority's intention to implement, where possible, the requirements in accordance with NUREG-0737 and to meet the implementation dates of Enclosure 1 therein. However, various items have not been sufficiently evaluated nor has engineering and design progressed to a level of detail whereby additional deviations can be identified at this time. Further, meeting the required scheduled dates is subject to equipment availability which in most cases can not be determined until well into the implementation period. Thus, as the Authority's effort to implement NUREG-0737 at the James A. FitzPatrick Nuclear Power Plant continues, additional requests for relief or implementation schedule extension together with the appropriate justification may be forthcoming. Although none are currently anticipated, those submittals, will be provided at the earliest possible time.

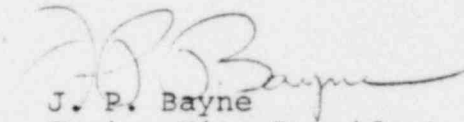
Finally, where equipment in conformance with the qualification requirements is not available, the following course of action will be taken on a case-by-case basis:

- a. The implementation dates will be met by installing the best available equipment. The deviations will be described and a schedule for upgrading the equipment qualification, through acceptable methods, or installing equipment in conformance with NUREG-0737 will be provided or,
- b. An extension in the implementation schedule and/or relief from the equipment qualification criteria for those aspects of non-conformance, along with

appropriate justification, will be submitted.

Should you have any questions regarding the above matter,  
please do not hesitate to contact me.

Very truly yours,

  
J. P. Bayne  
Senior Vice President  
Nuclear Generation