ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING CONTAINMENT LEAK RATE TEST REQUIREMENTS

(JPTS-84-012)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

3.7 (cont'd)

(2) During testing which adds heat to the suppression pool, the water temperature shall not exceed 10°F above the normal power operation limit specified in (1) above. In connection with such testing, the pool temperature must be reduced to below the normal power operation limit specified in (1) above within 24 hours.

(3) The reactor shall be scrammed from any operating condition if the pool temperature reaches 110°F. Power operation shall not be resumed until the pool temperature is reduced below the normal power operation limit specified in (1) above.

(4) During reactor isolation conditions, the reactor pressure vessel shall be depressurized to less than 200 psig at normal cooldown rates if the pool temperature reaches 120°F.

2. Primary containment integrity shall be maintained at all times when the reactor is critical or when the reactor water temperature is above 212°F, and fuel is in the reactor vessel, except while performing low power physics tests at atmospheric pressure at power levels not to exceed 5 MWt.

4.7 (cont'd)

2. Primary containment integrity shall be demonstrated in accordance with the requirements of 10 CFR 50 Appendix J. The FitzPatrick plant specific test conditions and exemptions are as follows:

a. Type A Test (Primary Containment Integrated Leakage Rate Test)

1. The test parameters applicable to the Type A test are as follows:

Pa = 45 psig.

La = 1.5 weight %/24 hrs.

4.7 (cont'd)

2. The acceptance criteria for the Type A test is as follows:

   The measured leakage rate (Lam) shall be less than 0.75 La of the contained air per 24 hours at the test pressure Pa.

3. Exemptions from 10 CFR 50 Appendix J with regard to the Type A test are as follows:

   a. Three Type A tests shall be performed, at approximately equal intervals, during each 10-year service period.

   b. A Type A test does not need to be conducted during the 10-year plant ISI outage provided that specification 4.7.A.2.a.3.a above is met.

b. Type B Test (Local Leakage Rate Test)

1. The test conditions applicable for Type B tests are as follows:

   a. All Type B tests shall be performed by local pneumatic pressurization of the containment penetrations, either individually or in groups, at a pressure not less than Pa, and the gas flow to maintain Pa shall be measured.

4.7 (cont'd)

2. Type B Tests of Airlocks

a. Type B tests of airlocks shall be conducted at an internal pressure of not less than 45 psig (Pa). The overall leakage rate for the airlock shall be less than or equal to 268 SCFD. Airlock tests shall be conducted:

1. Every six months.

2. Prior to restoration of containment integrity, when maintenance has been performed on the airlock which could affect its sealing capability.

3. Within three days of opening the airlock, when containment integrity is required and maintenance has been performed on the airlock which could affect its sealing capability.

b. Airlock seals shall be tested at a pressure not less than 45 psig. The seal leakage rate shall be less than or equal to 120 SCFD. Airlock seal tests shall be conducted:

1. Prior to restoration of containment integrity. If maintenance which could affect sealing capability was performed the entire airlock shall be tested as required by 4.7.A.2.b.2.a.

4.7 (cont'd)

2. Within three days after opening the airlock, when containment integrity is required.

3. Once every three days, during periods of frequent opening when containment integrity is required.

3. Exemptions from 10 CFR 50 Appendix J with regard to Type B tests are as follows:

a. Type B tests, (except tests for airlocks), shall be performed once per operating cycle.

b. Type B testing of airlocks shall be performed in accordance with specification 4.7.A.2.b.2 above.

4.7 (cont'd)

c. Type C Test (Local Leakage Rate Test of Containment Isolation Valves)

1. The test conditions applicable for Type C tests are as follows:

   a. Type C tests shall be performed by local pressurization. The pressure shall be applied in the same direction as that when the valve would be required to perform its safety function, except as listed in Table 4.7-2, unless it can be determined that the results from the tests for a pressure applied in a different direction will provide equivalent or more conservative results. Each valve to be tested shall be closed by normal operation and without any preliminary exercising or adjustments.

   b. Valves, unless pressurized with fluid from a seal system, shall be pressurized with air or nitrogen at a pressure of Pa, and the gas flow to maintain Pa shall be measured.

4.7 (cont'd)

2. Special Type C Tests

   a. The leakage rate for containment isolation valves 10AOV-68A, B (penetration X-13A, B) for Low Pressure Coolant Injection System and 14AOV-13A, B (penetration X-16A, B) for Core Spray System shall be less than 10 cubic feet per minute per valve (pneumatically tested at 45 psig with ambient temperature) or 10 gallons per minute per valve (hydrostatically) tested at 1000 psig with ambient temperature.

   b. Main Steam Isolation Valves (MSIV)

      1. MSIVs may be tested at a reduced pressure of Pt = 25 psig.

      2. The allowable leakage rate for any one MSIV shall be less than 11.5 standard cubic feet per hour (SCFH) when tested at Pt = 25 psig.

      3. A correction factor equal to $\sqrt{\frac{Pa}{Pt}}$ shall be used to multiply the reduced pressure leakage rates for the MSIVs prior to summing with the leakage rates for all other penetrations and valves subject to Type B & C tests.

4.7 (cont'd)

3. Exemptions for 10 CFR 50 Appendix J with regard to Type C testing are as follows:

   a. Type C tests shall be performed once per operating cycle.

   b. Valves which are sealed with fluid from a seal system, such as the liquid in the suppression chamber, shall not be tested. See Table 4.7-2 for the list of valves.

   c. The MSIVs are tested at a reduced pressure (Pt), and a correction factor is applied to the measured leakage rate in accordance with specification 4.7.A.2.c.2.b above.

   d. The combined leakage rate corrected to Pa for all penetrations and valves subject to type B and C tests shall be less than 0.60 La. Leakage from containment isolation valves that are sealed with fluid from a seal system may be excluded when determining the combined leakage rate provided that the installed isolation valve seal-water system fluid inventory is sufficient to assure the sealing function for at least 30 days.

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4.7 BASES

A. Primary Containment

The water in the suppression chamber is used only for cooling in the event of an accident; i.e., it is not used for normal operation; therefore, a daily check of the temperature and volume is adequate to assure that adequate heat removal capability is present.

The primary containment preoperational test pressures are based upon the calculated primary containment pressure response corresponding to the design basis loss-of-coolant accident. The peak drywell pressure would be about 45 psig which would rapidly reduce to 27 psig within 30 sec. following the pipe break. Following the pipe break, the suppression chamber pressure rises to 26 psig within 30 sec, equalizes with drywell pressure and thereafter rapidly decays with the drywell pressure decay (14).

The design pressure of the drywell and suppression chamber is 56 psig(15). The design basis accident leakage rate (Ld) is 0.5 percent/day at a pressure of 45 psig. As pointed out above, the drywell and suppression chamber pressure following an accident would equalize fairly rapidly. Based on the primary containment pressure response and the fact that the drywell and suppression chamber function as a unit rather than the individual components separately.

The design basis loss-of-coolant accident was evaluated in FSAR Section 14.6 incorporating the primary containment maximum allowable accident leak rate (La) of 1.5 percent/day. The analysis showed that with the leak rate and a standby gas treatment system filter efficiency of 99 percent for halogens, 99 percent for particulate and assuming the fission product release fractions stated in TID-14844, the maximum total whole body passing cloud dose is about 0.97 rem and the maximum total thyroid dose is about 11.4 rem at the site boundary over an exposure duration of two hours. The resultant thyroid dose that would occur over a 30-day period is 32.5 rem at the boundary of the low population zone (LPZ). Thus, these doses are the maximum that would be expected in the unlikely event of a design basis loss-of-coolant accident. These doses are also based on the assumption of no holdup in the secondary containment, resulting in a direct release of fission products from the primary containment through the filters and stack to the environs. Therefore, the specified primary containment leak rate and filter efficiency are conservative and provide additional margin between expected offsite doses and 10CFR100 guidelines.

4.7 BASES (cont'd)

In accordance with Appendix J paragraph III.A.5(b)(2), the measured leakage rate (Lam) for the peak pressure Type A test shall be less than 0.75 La. The primary containment structure is operated at a slight positive pressure to continuously monitor primary containment leakage.

As most leakage and deterioration of integrity is expected to occur through penetrations, especially those with resilient seals, a periodic leak rate test program of such penetrations is conducted at the peak pressure of 45 psig to insure not only that the leakage remains acceptably low but also that the sealing materials can withstand the accident pressure. The Main Steam Isolation Valves (MSIV) are tested by pressurizing the volume between each pair of valves at a reduced pressure of 25 psig. Higher pressure may cause the inboard valve to unseat, resulting in artificially high measured leakage rate. For airlock leak test, a seal test at the peak pressure could be substituted for the complete airlock test, if no maintenance work is done which could affect the sealing capability of the airlock.

The leak rate testing program was originally based on Commission guidelines for development of leak rate testing and surveillance schedules for reactor containment vessels (16), and discussed in Question 5.4 of the FSAR. With the exceptions listed in Table 4.7-2, the system conforms to the latest Commission guidelines (17). The exceptions stated in Table 4.7-2 are necessary since additional requirements were added after the system was designed.

The exemptions in specification 4.7.A.2 deviate from the requirements of 10 CFR 50 Appendix J. In accordance with NRC approved exemptions from Appendix J, the requirements set forth in the Technical Specifications take precedence.

B. Standby Gas Treatment System and

C. Secondary Containment

Initiating reactor building isolation and operation of the Standby Gas Treatment System to maintain at least a 1/4 in. of water vacuum within the secondary containment provides an adequate test of the operation of the reactor

ATTACHMENT II

SAFETY EVALUATION FOR PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING CONTAINMENT LEAK RATE TEST REQUIREMENTS

(JPTS-84-012)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
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I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications replaces Specification 4.7.A.2 on pages 166 through 175, and revises the associated Bases on pages 193 and 194. Technical Specification 4.7.A.2 provides the requirements for performing Primary Containment Integrated and Local Leakage Rate Tests.

Specification 4.7.A.2 is replaced in its entirety. The replacement specifications are shown in Attachment I. All of the text on pages 173a through 175 has been either deleted or relocated. These pages shall be removed from the Technical Specifications. The changes to the Bases are described below.

Page 193, Bases for Specification 4.7.A

THIRD PARAGRAPH

Insert "(Ld)" after "design basis accident leakage rate."

FOURTH PARAGRAPH

Insert "(La)" after "allowable accident leak rate."
Replace ".97" with "0.97."

Page 194, Bases 4.7 (cont'd)

FIRST PARAGRAPH

Relocate this text to page 193 to complete this paragraph.

SECOND and THIRD PARAGRAPHS

Replace these paragraphs with the following:

> *In accordance with Appendix J paragraph III.A.5(b)(2), the measured leakage rate (Lam) for the peak pressure Type A test shall be less than 0.75 La. The primary containment is operated at a slight positive pressure to continuously monitor primary containment leakage.*

FOURTH PARAGRAPH

Insert the following after the first sentence in the right column:

> *The Main Steam Isolation Valves (MSIV) are tested by pressurizing the volume between each pair of valves at 25 psig. Higher pressure may cause the inboard valve to unseat, resulting in artificially high measured leakage rate.*

Insert the following at the end of Bases 4.7.A:

The exemptions in specification 4.7.A.2 deviate from the requirements of 10 CFR 50 Appendix J. In accordance with NRC approved exemptions from Appendix J, the requirements set forth in the Technical Specifications take precedence.

II. PURPOSE OF THE PROPOSED CHANGES

The purpose of the proposed changes is to revise the Technical Specifications to reference current NRC regulations concerning primary containment leakage rate testing. The FitzPatrick Technical Specifications were originally written prior to the adoption of 10 CFR 50 Appendix J. Therefore, to assure that the primary containment would be leak tested, many of the requirements of Appendix J were incorporated directly into the Specifications. Minor exceptions from Appendix J were then approved by the NRC as part of the initial issuance of the Technical Specifications. In order to avoid unnecessary duplication of requirements, the portions of Appendix J currently written into the Technical Specifications are removed. Those specifications which constitute previously approved exemptions are retained.

The following table provides a cross reference between the existing Technical Specification 4.7.A.2 and corresponding sections of 10 CFR 50 Appendix J. This table demonstrates that all testing requirements that are being removed by this amendment are still effective by the requirements of Appendix J.

Technical Specification	**10 CFR 50 Appendix J**	**Notes or Comments**
4.7.A.2.a(1)	III.A	
4.7.A.2.a(2)	III.A 1(b)	
4.7.A.2.a(3)	III.A.1(c)	
4.7.A.2.a(4)	III.A.1(d)	
4.7.A.2.a(5)	III.A.3(a)	
4.7.A.2.a(6)	III.A.3(b)	
4.7.A.2.a(7)(a)	III.A.4(a)(1)(i)	
4.7.A.2.a(7)(b)	III.A.4(a)(1)(ii)	
4.7.A.2.a(7)(c)	III.A.4(a)(1)(iii)	
4.7.A.2.a(8)	III.A.5(a)(2)(b)(1) and III.A.5(b)	The acceptance criterion is being retained and clarified in the revised Specifications.
4.7.A.2.a(9)	III.A.5(a)(1)&(2)	
4.7.A.2.a(10)	III.A.6(a) and (b)	
4.7.A.2.b(1)	III.B.2	The test method is being retained in the revised Specifications.
4.7.A.2.b(2)	III.B.3(a)	
4.7.A.2.c(1)	III.C.1	References to Table 4.7-2 are being retained.
4.7.A.2.c(2)	III.C.2	The test method is being retained.
4.7.A.2.c(3)	----	This specification is being retained.
4.7.A.2.c(4)	----	References to Table 4.7-2 are being retained.

Technical Specification	10 CFR 50 Appendix J	Notes or Comments
4.7.A.2.c(5)	III.C.3 and III.C.3(b)	The FitzPatrick seal-water system (suppression pool) must not be at a pressure of 1.10 P
4.7.A.2.d(1)	----	An existing error in the specification is being corrected
4.7.A.2.e(1)	III.D.1 and III.D.1(b)	This specification is being revised as discussed below.
4.7.A.2.e(2)	III.D.2	This specification is being revised as discussed below.
4.7.A.2.e(3) thru 4.7.A.2.e(4)(c)	III.D.2(b)(i) thru III.D.2(b)(iv)	These specifications are being retained.
4.7.A.2.e(5)	III.D.3	This specification is being revised as discussed below.
4.7.A.2.e(6)	----	This specification is being revised as discussed below.
4.7.A.2.f	IV.A	

The Specifications noted above as being revised constitute new exemptions from 10 CFR 50 Appendix J. These exemptions provide greater flexibility in scheduling Type A, B and C integrated and local leak rate tests. Specifically the Authority is requesting that the Type B and C test surveillance interval be revised to once per operating cycle, eliminating the 24 month maximum interval constraint. This will eliminate the need to shut down solely to perform surveillance testing. In addition, the Type A test surveillance interval is being revised such that the third test of each set need not correspond to the 10-year inservice inspection outage.

Appendix J and the current Technical Specifications allow for reduced pressure periodic Type A ILRTs. During the pre-operational ILRT at FitzPatrick, both peak pressure and reduced pressure tests were performed. The Authority was unable to correlate the results from the two tests and, therefore, has performed only peak pressure tests for the periodic ILRTs. Therefore, the Bases concerning reduced pressure ILRT are being deleted from the Technical Specifications.

The Main Steam Isolation Valves (MSIVs) for most BWRs including the FitzPatrick plant are tested at a reduced pressure and have individual valve leakage rate acceptance criteria. This test condition is referred to in Technical Specification Table 4.7-2 "Exceptions to Type C tests." The proposed change more clearly describes this existing exception to Appendix J in the text of the Technical Specifications and provides an associated Basis.

The Type A test acceptance criteria currently contained in Specification 4.7.A.2.a(8) is being revised to conform to Appendix J. The existing specification was written to support the pre-operational test and, therefore, the acceptance criteria of 0.75 La and not greater than Ld was appropriate and consistent with Appendix J, paragraph III.A.4(b)(2). This technical specifications is being revised to less than 0.75 La, consistent with the periodic test acceptance criteria of Appendix J, paragraph III.A.5(b)(2).

In the past, this same specification had been interpreted to state that the numerical value of the allowable leak rate, La, was 0.5 weight percent of the contained air volume per day and, therefore, the Type A acceptance criteria was 0.375 percent per day (0.75 La). As discussed in the Technical Specification Bases, FSAR, in letters from the FitzPatrick plant Architect/Engineer, and in the FitzPatrick plant original licensing correspondences (References 1, 3 and 4), the correct value of La is 1.5 percent per day and that 0.5 percent per day represents the value of the design leakage rate, Ld. The values of La and Ld are being clarified in the revised specifications.

The three affects of this clarification are as follows: 1) The value of the Type A test leakage acceptance criteria of 0.75 La increases to 1.125 percent per day; 2) The value of the combined Type B & C test leakage acceptance criteria of 0.6 La would increase to 0.9 percent per day; and 3) The value of the "As-found" Type A test acceptance criteria (when required) becomes 1.5 percent per day (La). These values are consistent with the FitzPatrick FSAR accident analysis and the requirements of Appendix J. This change has no effect on the testing program beyond the revision of the acceptance criteria. These changes make it less likely that the test results would require the test to be declared a failure. These new values are consistent with the FSAR analyses and the requirements of 10 CFR 50 Appendix J and do not constitute an increase in the allowable leakage rates as analyzed in the FSAR. Therefore, these changes have no affect on plant safety.

III. EXEMPTION REQUEST

As part of the proposed changes to the Technical Specifications, and in accordance with 10 CFR 50.12(a), the Authority requests two changes which constitute exemptions to the requirements of 10 CFR 50 Appendix J. These exemptions are described below:

1. Surveillance Interval for Performing Type A Tests

   10 CFR 50 Appendix J §III.D.1.(a) requires that three Type A tests shall be conducted at approximately equal intervals during each ten years service period. In addition, the third test shall be conducted while the plant is shut down for the 10-year plant inservice inspection outage.

   No tangible link exists between the third ILRT and the ISI inspections performed during 10-year inservice inspection outage. The Authority, therefore, requests an exemption from the requirement that the third Type A test in each ten year service period correspond with the 10-year inservice inspection outage.

2. Surveillance Interval for Performing Type B and C Tests

   10 CFR 50 Appendix J §III.D.2.(a) and §III.D.3 both require that local leak rate tests (Type B and C LLRTs, respectively) be performed during each shutdown for refueling, but in no case at intervals greater than two years. This requirement was reasonable and posed no hardships when typical operating cycles were from one year to 15 months in length. Most plants now have longer operating cycles to improve overall fuel economies and plant availabilities.

   Currently, the FitzPatrick plant has 18 month operating cycles and is planning to extend the cycle length to 24 months starting with Cycle 11 in 1991. With the advent of longer operating cycles, it becomes more likely that the two year limit may expire while the plant is still at power. To avoid a forced shutdown solely to perform Technical Specification

surveillances, the Authority is requesting an exemption from the two year limit on the Type B and C LLRT surveillance interval. Specifically, the Authority requests that the surveillance interval be once per operating cycle with no additional constraints.

10 CFR 50.12(a) indicates that the Commission may grant exemptions if special circumstances are present. The circumstances which apply to the proposed changes are discussed below.

Circumstance (ii) states:

> *Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule;*

The underlying purpose of the schedules contained in 10 CFR 50 Appendix J §III.D.1.(a), III.D.2.(a), and III.D.3 is to assure that containment testing is performed such that valve degradation is identified and repaired before containment leakage exceeds acceptable levels. This purpose is met through the Technical Specification requirement that Type A testing be performed three times every 10 years and that Type B and C testing be performed during each refueling outage. There is no tangible link between the ILRT and the ISI inspections performed during 10-year inservice inspection outage. Therefore, this requirement is unnecessary to achieve the purpose of Appendix J.

Circumstance (iii) states:

> *Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated.*

When Appendix J was adopted, cycle lengths of one year were standard. Therefore, the 24 month limit on Type B and C tests posed no hardships. With extended cycle lengths of up to 24 months, this requirement may now require plant shutdown solely to conduct Type B and C surveillance. This forced shutdown and its associated costs constitute hardships significantly in excess of those contemplated when Appendix J was adopted. The proposed exemption would also facilitate outage work scheduling, since it would not be necessary to perform a Type A ILRT specifically during the 10 year inservice inspection outage.

IV. IMPACT OF THE PROPOSED CHANGES

The most significant aspect of the proposed change is referencing the test requirements of 10 CFR 50 Appendix J instead of listing them in the Technical Specifications. This results in the elimination of unnecessary redundancy and the requirement to comply with potentially conflicting requirements. An example of conflicting requirements occurred with respect to the Type A data analysis methodology. In recent ILRT tests, the Authority had to perform both the "mass point" and "total time" analyses, because, prior to the November 15, 1988 revision of Appendix J, the "mass point" technique was required by the Technical Specifications and the "total time" analysis was required by reference to the ANS N45.4 standard in Appendix J.

The Authority is aware that the NRC is preparing a substantial revision to Appendix J. By referencing Appendix J directly, the Authority can implement these changes to the regulations without also having to meet the requirements of the existing Appendix J as contained in the Technical Specifications. In addition, exemptions to Appendix J can be granted without

amendments to the Technical Specifications. Since the need for an exemption often arises with little advance notice, the need to process simultaneous amendments to the Technical Specifications on an emergency basis is avoided. This reduces unnecessary burden on both the Authority and the NRC staff.

The Authority wishes to retain those portions of the existing Technical Specifications which constitute previously approved exceptions and exemptions from Appendix J. These specifications remain in effect in the revised Specification 4.7.A.2. In addition to these exemptions, the Authority is requesting new exemptions regarding scheduling of Type A, B and C leak rate tests. As discussed in Section III above, these exemptions have no significant impact on plant safety.

V. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the FitzPatrick plant in accordance with the proposed amendment would not involve a significant hazards consideration as stated in 10 CFR 50.92, since it would not:

1. **involve a significant increase in the probability or consequences of an accident previously evaluated.**

   The proposed specifications do not involve changes to plant equipment or the FitzPatrick plant's ability to prevent or mitigate accidents. The changes are administrative in nature, since all of the requirements being removed from the Technical Specifications will continue to be in effect by their presence in 10 CFR 50 Appendix J. The proposed changes remove the redundancy of having multiple sources of identical test requirements. The overall purpose of the specifications under revision is to assure that the containment system is tested on a routine basis to verify and assure its leak tight integrity. No change is being made which can affect this purpose. Therefore, there is no increase in the probability or consequences of an accident previously evaluated.

2. **create the possibility of a new or different kind of accident from any accident previously evaluated.**

   The proposed changes concern the surveillance test requirements for the FitzPatrick plant containment systems. This testing program cannot initiate any type of accident. The containment testing program is designed to assure that the assumptions of the FSAR accident analysis with regard to containment performance are met.

3. **involve a significant reduction in a margin of safety.**

   As discussed above, the proposed changes are purely administrative in nature and remove unnecessary redundancy between the FitzPatrick Technical Specifications and the requirements of 10 CFR 50 Appendix J. Referencing Appendix J directly allows the Authority to implement changes to the regulations without either having to amend the Technical Specifications or having to comply with multiple requirements. The only change to the containment testing program concerns the scheduling of Type A, B and C leakage rate tests. These changes allow for increase flexibility in the scheduling of the tests. No change is made to the testing program which can affect any margin of safety.

VI. IMPLEMENTATION OF THE PROPOSED CHANGE

Implementation of the proposed changes will not impact the ALARA or Fire Protection Programs at the FitzPatrick plant, nor will the changes impact the environment.

VII. CONCLUSION

The change, as proposed, does not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, it:

a. will not change the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;

b. will not increase the possibility of an accident or malfunction of a type different from any previously evaluated in the Safety Analysis Report;

c. will not reduce the margin of safety as defined in the basis for any technical specification;

d. does not constitute an unreviewed safety question; and

e. involves no significant hazards consideration, as defined in 10 CFR 50.92.

VIII. REFERENCES

1. James A. FitzPatrick Nuclear Power Plant Updated Final Safety Analysis Report, Sections 5.2.4.4 and 14.6.1.3.5.

2. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER), dated November 20, 1972, and Supplements.

3. LeBeouf, Lamb, Leiby, & MacRae Letter to P. A. Morris (AEC), dated March 10, 1972, providing Amendment No. 5 to Application for License with Supplement No. 5 to the FitzPatrick FSAR, Response to AEC letter, dated 11/29/71, Question 5.10.

4. Stone & Webster Engineering Corp. letter, B. C. Kuechler to R. Pasternak (PASNY), dated April 4, 1980, Response to NRC inspection report.