

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



RAYMOND J. PASTERNAK
Resident Manager

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October 28, 1980
SERIAL: JAFP 80-838

Boyce H. Grier, Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

REFERENCE: DOCKET NO. 50-333 I&E INSPECTION NO. 80-12

Dear Mr. Grier:

With reference to the inspection conducted by W. Baunack and J. Linville of your office commencing July 1, 1980 and ending August 29, 1980 at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of Section 2.201 of Part II of Title 10 of the Code of Federal Regulations, we are submitting our response to Appendix A Notice of Violation transmitted by letter dated October 3, 1980 as received by the undersigned on October 9, 1980.

APPENDIX A

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted on July 1-August 29, 1980, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Facility License No. DPR-59, as indicated below. This item is a deficiency.

Technical Specification 6.8(A), states in part, "Written procedures and administrative policies shall be established, implemented and maintained..".

Administrative Procedure No. 1.4, Control of Plant Procedures, Revision 3, November 1979 establishes the management controls for distribution of procedures. AP 1.4 states in part under the following paragraphs:

- 7.6.1, "The department superintendent shall insure that procedures and revisions are distributed to the authorized manual holders..."
- 7.6.2, "Current, effective copies of the following procedures shall be maintained in the control room.
 - a. Operating Procedures."

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- 7.8, "An index shall be maintained to provide a guide for procedures authorized for use at the plant."

Contrary to the above, a review of control room and shift supervisors' copies of controlled procedures performed on August 9, and 10, 1980 revealed the following:

- Form II, Final Prestart Check-off, a part of procedure F-OP-65, Startup and Shutdown Procedure in use during the preparation for startup was Revision 3 when a later Revision 4 had been issued.
- The shift supervisors' operating procedures manual contained a superseded revision of Procedure F-OP-18, Reactor Protection System.
- The shift supervisors' operating procedures manual contained an outdated index to operating procedures.
- Procedure F-OP-25, Control Rod Drive Hydraulic System, was missing from the shift supervisors' operating procedures manual.
- The shift supervisors' procedures manual copy of Procedure F-OP-13, Residual Heat Removal System, had been superseded by three revisions.
- Both the control room and shift supervisors' operating procedures manual contained superseded copies of Procedure F-OP-30, Fuel Pool Cooling and Clean-up System.

RESPONSE TO VIOLATION

The Operations Department reviewed the shift supervisors' and control room operating procedures manuals following the inspection to correct the deficiencies noted above and verified that other procedures in both sets of manuals were up to date. This action resulted in the FitzPatrick Plant being in full compliance.

To prevent recurrence in the future, the Operations Department Superintendent, or his designated alternate, will review the procedure manuals noted, as well as other procedure manuals of importance, on a quarterly basis. This quarterly review of the manual contents will be continued until the results indicate that the interval between reviews may be increased.

Very truly yours,

Robert Baker for

RAYMOND J. PASTERNAK
RESIDENT MANAGER

RJP:VC:brp

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