#### POWER AUTHORITY OF THE STATE OF NEW YORK

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April 10, 1981 JPN-81-26

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

Dear Sir:

Based on a recent telephone conversation between members of the NRC staff and Power Authority personnel, the Authority submits the following information and/or clarification pertaining to NUREG-0737 items:

### I.A.1.1.4 Shift Technical Advisor - Long Term Program

As discussed with members of your staff, no Power Authority action regarding this item is required at this time.

## I.A.2.1 Upgrading of RO and SRO Training and Qualifications

The Authority's Licensed Operator/Senior Operator Replacement Training procedures were revised to conform to the requirements of Mr. Harold R. Denton's March 28, 1980 letter. These procedures were submitted to OLB (Mr. P.F. Collins) by Mr. D.M. Thomison of the Authority in a letter dated October 24, 1980. This submittal to OLB is as requested by the March 28, 1980 letter.

#### II.B.2 Plant Shielding

The Authority has completed the shielding analysis referred to in the letter from J.P. Bayne (Power Authority) to T.A. Ippolito (NRC) dated January 8, 1981 and is currently evaluating the results of this analysis to determine if any modifications are required. The issue of equipment qualification has not been addressed in this analysis but will be included in the Authority's on-going efforts to comply with I.E. Bulletin 79-01B.

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#### II.B.4 Training for Mitigating Core Damage

As discussed in the letter from J.P. Bayne (Power Authority) to T.A. Ippolito (NRC) dated March 13, 1981, an extension of the training program starting date to April 20, 1981 has been requested.

# II.K.3.16 Reduction of Challenges and Failures of Relief Valves - Feasibility Study and System Modification

The Authority endorses the study conducted by the BWR Owners' Group (submitted to NRC on March 31, 1981) and concludes that no substantial modification is necessary to reduce the challenges to the safety relief valves. However, by way of improvement, all the three-stage Target Rock safety relief valve topworks have been replaced with the two-stage design. As part of the containment load reduction study, the Authority has initiated efforts to analyze lowering the main steam isolation valves closures setpoint on reactor low level and also low-low set relief, on selected safety relief valves.

## II.K.3.18 Modification of Automatic Depressurization System Logic

The Authority concurs with the conclusion of the study conducted by the BWR Owners' Group (submitted to NRC on March 31, 1981) that, based on the emergency procedure guidelines (developed and submitted by the BWR Owners' Group to the Commission), operator action is adequate to manually initiate ADS and ensure low pressure injection in a timely manner, to ensure core cooling.

## II.K.3.27 Common Reference Level for Vessel Level Instrumentation

As discussed in the letter from J.P. Bayne (Power Authority) to T.A. Ippolito (NRC) dated January 8, 1981, it is the Authority's position that, on the basis of safety consideration, no modification of plant control room reactor water level instrumentation is required. However, in the event that a final determination is made by the Commission that the Authority's position is unacceptable, the Luthority would then provide a means whereby the zero points of all level instruments would be referenced to the same point e.g. top of active fuel. As discussed with members of your staff, this could be accomplished by using fixed markers external to the level indicators to show the correlation of presently used level indication to the common reference level.

Should you require further information, please do not hesitate to contact us.

Very truly yours,

J. P. Bayne
Senior Vice President
Nuclear Generation

cc: Mr. J. Linville Resident Inspector

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