NEW YORK POWER AUTHORITY

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

INSERVICE INSPECTION HYDROSTATIC TEST PROGRAM FOR CLASS 2 AND 3 SYSTEMS CONDUCTED DURING THE FIRST 10-YEAR INSPECTION INTERVAL

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

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PDR ADOCK 05000333
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1. INTRODUCTION

To meet the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition through the Summer 1975 Addenda, the Authority performed hydrostatic tests for the first 10-year inspection interval on ISI Class 2 and 3 systems at the James A. FitzPatrick Nuclear Power Plant.

Relief is requested for those cases in which ASME Section XI, 1974 Edition through Summer 1975 Addenda requirements are impractical. In some cases, relief is requested to allow use of the requirements of the 1980 Edition through Winter 1981 Addenda of the code.

Visual examinations (VT-2) were performed to verify the integrity of the piping systems by personnel qualified/ certified to ANSI N45.2.6. These inspections were performed in accordance with New York Power Authority Quality Assurance (QA) approved non-destructive examination procedures. Table 1-1 identifies the hydrostatic tests that were performed during the first 10-year inspection interval.

2. SCOPE OF TESTING

The systems subject to testing include all components identified as ISI Class 2 and the Reactor Core Isolation Cooling System (ISI Class 3). The system test boundaries and ISI classification utilized were based on the FitzPatrick Plant ISI Program plan boundary diagrams for the second inspection interval. The boundary diagrams for the second 10-year interval were used as they were revised to reflect the as-built conditions of the plant. The systems containing Class 2 components are listed in Table 2-1.

3. SUMMARY OF TEST METHODS

ASME Section XI requires the system testing pressure to be equal to or greater than 1.25 times the system design pressure. The FitzPatrick plant's original construction code (ANSI B31.1, 1967 Section 137.4.1) states, "The test pressure for the piping shall not exceed the maximum test pressure of any vessels or components in the piping system." Therefore, all system test pressures were based upon the lesser of the limiting component pressure limit or the ASME Section XI test pressure.

Systems designed to use a gas as the process medium were tested using air as a pressurizing medium and a liquid bubble solution (SNOOP) for leakage detection.

In accordance with ASME Section XI, 1974 Edition through the Summer 1975 Addenda, Subsection IWC-5220(d), open-ended portions of non-closed systems extending to the first shutoff valve are exempt from the testing requirements of ASME Section XI 1974 Edition through the Summer 1975 Addenda Subsection IWC-2510.

4. TEST RESULTS

The leak test acceptance criterion, as specified in the individual leak test procedure is, "there shall be no leakage from welded joints." In addition, leakage from mechanical joints shall be recorded and repaired, if required.

All detected leakage was reviewed in accordance with the FitzPatrick Plant QA Program. A Deficiency and Corrective Action Report (DCAR) was generated for all cases requiring additional review or corrective action. A record of all DCARs is maintained by the QA/QC department.

Several types of acceptable leakage were noted during the ISI inspection such as bolted flange leaks, valve packing leaks and other mechanical joint leaks. These items were reviewed and if required, non-conformance and corrective action reports were generated to resolve these deficiencies.

5. REQUESTS FOR RELIEF FROM CODE REQUIRED EXAMINATIONS

First 10-year interval

Relief is requested for those cases in which ASME Section XI, 1974 Edition through Summer 1975 Addenda requirements are impractical. In some cases, relief is requested to allow use of the requirements of the 1980 Edition through Winter 1981 Addenda of the code. Attachment I identifies and provides justification for exception to the code testing requirements as allowed in 10 CFR 50.55a(g)(5)(iii).

Second 10-year interval

The code of record for the second 10-year inspection interval is ASME Section XI, 1980 Edition through Winter 1981 Addenda. As allowed by 10 CFR 50.55a(g)(5)(iii) the Authority also requests relief for the hydrostatic tests to be conducted during the second 10-year interval (see Hydrostatic Relief Requests 4, 5, 6, 7, and 8 contained in Attachment I). The Authority has determined that in these cases, ASME Section XI, 1980 Edition through Winter 1981 Addenda requirements are also impractical.

Hydrostatic Relief Request 8 has been approved previously by the NRC for the first and second 10-year interval but is included in this report for historical reference.

Each hydrostatic relief request identifies the affected System(s), Component(s), Code Class, Code Test Requirements, Basis for Relief and Testing to be Performed in Lieu of the Code Requirements.

TABLE 1-1

SUMMARY OF HYDROSTATIC TESTS PERFORMED DURING THE FIRST 10-YEAR INSPECTION INTERVAL

Procedure No.	Title	Remarks
10/45477/3	"B" RHR Discharge - Remainder	
10/45477/6	RHR Shut-down Cooling Piping	
10/45477/7	"A" RHR Suction	
10/45477/8	"A" RHR Discharge-Heat Exchanger Section	
10/45477/9	RHR Crosstie and Fuel Pool Cooling Assist Line	
16-1/51424/1	Drywell-Torus dp Indication	
16-1/51424/2	Drywell-Torus dp Indication	
23/53364/8	Torus Level Instrumentation X-206 A&B	
23/53364/9	Torus Level Instrumentation X-206 C&D	
03/20109/1	CRD-Scram Discharge System Modification-East	Post-Mod Testing
03/20109/2	CRD-Scram Discharge System Modification-West	Post-Mod Testing
10/45477/1	"B" RHR Suction	
10/45477/2	"B" RHR Discharge-Heat Exchanger Suction	
10/45477/4	"B" RHR Drywell Spray	
10/45477/5	"B" RHR Head Spray	
10/21993/C	ATTS Mod-Penetration X-40Ec	Post-Mod Testing
10/21193/7	ATTS Mod-Penetration X-40Ed	Post-Mod Testing
10/21193/8	ATTS Mod-Penetration X-55a	Post-Mod Testing
10/21193/9	ATTS Mod-Penetration X-55c	Post-Mod Testing
11/045747/1	SLC Suction Piping	
11/045747/2	SLC Discharge Piping	
11/045747/3	SLC Pump 11P-2A - Functional Test	
11/045747/4	SLC Pump 11P-2B - Functional Test	

TABLE 1-1 (Cont'd)

SUMMARY OF HYDROSTATIC TESTS PERFORMED DURING THE FIRST 10-YEAR INSPECTION INTERVAL

Procedure No.	Title	Remarks
13/52475/1	RCIC Pump Suction and Torus Suction	
13/53357/2	Hydrostatic Test for 13RCIC-752 Replacement	Post-Mod Testing
13/52475/4	RCIC Pump Discharge	
13/52475/7	RCIC Turbine Steam Supply	
14/51422/1	"A" Core Spray Suction	
14/51422/2	"B" Core Spray Suction	
14/51422/5	"B" Core Spray Discharge	
14/51422/6	"A" Core Spray Discharge	
15/20249/1	Penetrations X-24, X-64: "B" Drywell Cooling Assembly RBC Supply/Return	Post-Mod Testing
15/20249/2	Penetrations X-67, X-68: "B" Recirculation Pump and Motor Coolers Supply/Return	Post-Mod Testing
15/20249/3	Penetrations X-63, X-64: "A" Recirculation Pump and Motor Coolers Supply/Return	Post-Mod Testing
15/20249/4	Penetrations X-23, X-65, X-66:"A" Drywell Cooling and Equipment Sump Cooler Supply/Return	Post-Mod Testing
16-1/52052/2	Mensor Mod-Torus dp Indication	Post-Mod Testing
20/51421/1	Radwaste Penetration X-18	
20/51421/2	Radwaste Penetration X-19	
23/53364/1	HPCI Pump Suction	
23/53364/2	HPCI Torus Suction	
23/53364/4	HPCI Pump Discharge	
23/53364/5	HPCI Steam Supply	

Table 2-1

SYSTEMS CONTAINING ISI CLASS 2 COMPONENTS

The following systems contain Class 2 components:

System No.	System	Remarks
01-125	Standby Gas Treatment	See Note 1
03	Control Rod Drive	Post Modification Testing
07	Tip Neutron Monitor	Exempt per Subsection IWC-5220(d)
10	Residual Heat Removal	Hydrostatic Relief Requests 1, 2, 3
11	Standby Liquid Control	Hydrostatic Relief Requests 1, 2, 4, 5
13	Reactor Core Isolation Cooling	Hydrostatic Relief Requests 1, 2, 3, 8 See Note 2
14	Core Spray	Hydrostatic Relief Request 3
15	Reactor Building Closed Loop Cooling Water	Hydrostatic Relief Request 7
16	Drywell/Torus Leak Rate Analyzer	Hydrostatic Relief Requests 1, 2
19	Fuel Pool Cooling and Cleanup	Examination performed under the scope of Heat Removal System testing
20	Radwaste	Hydrostatic Relief Requests 1, 2
23	High Pressure Coolant Injection	Hydrostatic Relief Requests 1, 2, 3, 8
27	Containment Air Dilution	See Note 1
33	Condensate	Exempt per Subsection IWC-5220(d)
39	Breathing, Instrument and Service Air	See Note 1
46	Service Water	Hydrostatic Relief Request 6

NOTES:

1. This system has been removed from the scope of the inservice inspection program. See Attachment II.
2. The Reactor Core Isolation Cooling System, although classified ISI Class 3, has been hydrostatically tested to the more conservative requirements of ASME Class 2.

ATTACHMENT I

HYDROSTATIC RELIEF REQUESTS

HYDROSTATIC RELIEF REQUEST 1

Systems:	All Class II/III
Components:	Various
Code Class:	2
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition through Summer 1975 Addenda, Subsection IWC-5220 states: "The system hydrostatic test pressure shall be at least 1.25 times the system design pressure (P_D) and conducted at a test temperature not less than 100°F except as may be required to meet the test temperature requirements of IWA-5230."
Basis for Relief:	Relief is requested from the referenced temperature requirement. The minimum 100°F temperature requirement presents considerable hardship and excessive cost to the testing program, since there is no direct means of heating the large volume of water required for performing the hydrostatic testing. ASME Section XI 1980 Edition through Winter 1981 Addenda, Subsection IWC-5230 does not specify a minimum test temperature for Class 2 systems composed entirely of austenitic material. For those composed all, or in part, of ferritic steel, test temperatures are required to meet requirements specified by fracture toughness criteria. Based on the above justification, the Authority concludes that the proposed alternate testing would not result in a decrease in safety.
Alternate Testing:	Perform hydrostatic testing of system containing ferritic steel components at a test temperature which meets the requirements for fracture prevention criteria. If fracture prevention criteria were neither specific nor required in component construction, the Authority determined the minimum test temperature. No limit on test temperature is specified for systems comprised of components constructed entirely of austenitic steel or other non-ferritic materials.

HYDROSTATIC RELIEF REQUEST 2

Systems:	All Class II/III
Components:	Various
Code Class:	2
Code Test Requirements:	1st Interval: ASME Section XI 1974 Edition though Summer 1975 Addenda, Subsection IWA-5210(a) requires the following: "The pressure-retaining components shall be visually examined while the system is under the hydrostatic test pressure and temperature. The test pressure and temperature shall be maintained for at least four hours prior to the performance of the examinations."
Basis for Relief:	Relief is proposed from the minimum hold time of four hours for visual inspection of noninsulated systems and components. The intent of the code is to hold the test pressure for four hours prior to the inspection of insulated components. This will allow sufficient time for the insulation to soak through. There is no practical purpose for holding the test pressure for four hours prior to the inspection of noninsulated components. ASME Section XI 1980 Edition through Winter 1981 Addenda, Subsection IWA-5213(d) recognizes this and requires a four hour holding time after attaining the test pressure and temperature condition for insulated systems, and ten minutes for noninsulated systems or components. Based on the above justification, the Authority concludes that the proposed alternate testing would not result in a decrease in safety.
Alternate Testing:	For insulated systems or components, the test pressure and temperature shall be maintained for a minimum of four hours prior to examination. For noninsulated systems or components, the test pressure and temperature will be maintained for a minimum of ten minutes prior to examination.

HYDROSTATIC RELIEF REQUEST 3

Systems:	Residual Heat Removal (RHR), Core Spray (CS), High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC)
Components:	RHR System pumps and discharge piping to the first isolation valve Core Spray System pumps and discharge piping to the first isolation valve HPCI System pump and discharge piping to the first isolation valve RCIC System pump and discharge piping to the first isolation valve
Code Class:	2 The RCIC System piping and components, although classified as ISI Class 3, have been tested hydrostatically to the more conservative requirements of ASME Class 2.
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition though Summer 1975 Addenda, Subsection IWC-5220(a) states: "The system hydrostatic test pressure shall be at least 1.25 times the system design pressure (P_D) and conducted at a test temperature not less than 100°F except as may be required to meet the test temperature requirements of IWA-5230."
Basis for Relief:	Relief from the referenced test pressure requirement for centrifugal pump discharge piping is requested. The discharge piping from the pump up to the first discharge valve on a centrifugal pump cannot be isolated from the pump suction. If the piping between the pump and first discharge valve were pressurized to the required test pressure, the pump suction piping would be subjected to pressures which exceed its design and potentially cause permanent damage to the piping and system components. ASME Section XI 1980 Edition though Winter 1981 Addenda, Subsection IWA-5224(d) identifies specific testing requirements for this condition as follows: "Where the respective system primary pressure rating on the suction and discharge side of system pumps differ, the system test boundary shall be divided into two separate boundaries (such as suction side and discharge side test boundaries). In the case of positive displacement pumps, the boundary interface shall be considered as the pump. In the case of centrifugal pumps, the boundary interface shall be the first shutoff valve on the discharge side of the pump." Based on the above justification, the Authority concludes that the proposed alternate testing would not result in a decrease in safety.
Alternate Testing:	The test pressure for the subject pumps, from the pump discharge to the first isolation valve on the discharge side of the pump, shall be the same pressure required for the piping and components on the suction side of the pump.

HYDROSTATIC RELIEF REQUEST 4

Systems:	Standby Liquid Control (SLC)
Components:	SLC System pumps and discharge piping up to the pump discharge check valves
Code Class:	2
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition through Summer 1975 Addenda, Subsection IWC-5220(a) states: "The system hydrostatic test pressure shall be at least 1.25 times the system design pressure (P_D) and conducted at a test temperature not less than 100°F except as may be required to meet the test temperature requirements of IWA-5230." 2nd Interval ASME Section XI 1980 Edition through Winter 1981 Addenda, Subsection IWC-5220(a) states: "The System hydrostatic test pressure shall be at least 1.10 times the system pressure Psv for systems with a Design Temperature of 200°F or less, and at least 1.25 times the system pressure Psv for systems with Design Temperature above 200°F."
Basis for Relief:	Relief from the referenced test pressure is requested. The SLC pumps are positive displacement pumps with discharge check valves located immediately downstream of the pumps. There is no way to test the piping between the pump and discharge check valve without removing the check valve internals. Based on the above justification, the Authority concludes that the proposed alternate testing would not result in a decrease in safety.
Alternate Testing:	Perform a system functional test at nominal operating pressure, holding pressure for more than ten minutes prior to inspection of the uninsulated piping.

HYDROSTATIC RELIEF REQUEST 5

Systems:	Standby Liquid Control (SLC)
Components:	Standby Liquid Control Storage Tank
Code Class:	2
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition through Summer 1975 Addenda, Subsection IWC-5220(c) states: "In the case of storage tanks, the nominal hydrostatic pressure developed with the tank filled to its design capacity shall be acceptable as the system test pressure." 2nd Interval ASME Section XI 1980 Edition through Winter 1981 Addenda, Subsection IWC-5222(b) states: "In the case of atmospheric storage tanks, the nominal hydrostatic pressure developed with the tank filled to its design capacity shall be acceptable as the system test pressure. For 0-15 psi (0-103 kPa) storage tanks, the test pressure shall be $1.1P_G$ Design Pressure of vapor or gas space above liquid level for which overpressure protection is provided by relief valves."
Basis for Relief:	Relief from the referenced test pressure is requested. The Standby Liquid Control tank is an atmospheric tank with a volume of 5000 gallons. The Technical Specifications require this tank to be maintained at a minimum volume of 2200 gallons and a maximum volume of 4780 gallons. Standard plant practice is to maintain the tank level between 87% and 90% of capacity or between 4350 and 4500 gallons. Filling this tank to its design capacity would exceed the plant Technical Specification limit for tank volume and may affect the sodium pentaborate solution concentration adversely. Based on the above justification, the Authority concludes that the proposed alternate testing would not result in a decrease in safety.
Alternate Testing:	As required by the plant Technical Specifications, the solution volume is checked at least once per day. This provides reasonable assurance that any leakage would be detected.

HYDRCSTATIC RELIEF REQUEST 6

Systems:	Service Water
Components:	Piping at penetration X-20 from check valve inside the drywell, through containment wall to welded cap.
Code Class:	2
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition through Summary 1975 Addenda, paragraph IWC-5220 states: "The system hydrostatic test pressure shall be at least 1.25 times the system design pressure (P_D) and conducted at a test temperature not less than 100°F except as may be required to meet the test temperature requirements of IWA-5230." 2nd Interval ASME Section XI 1980 Edition through Winter 1981 Addenda, Paragraph IWC-5222(a) states: "The system hydrostatic test pressure shall be at least 1.10 times the system pressure Psv for systems with Design Temperature of 200°F (93°C) or less, and at least 1.25 times the system pressure Psv for systems with Design Temperature above 200°F (93°C). The system pressure Psv shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure P_D shall be substituted for Psv."
Basis for Relief:	Relief from the performance of hydrostatic testing is requested. This is a deactivated portion of piping. Penetration X-20 has been identified as a spare penetration since before 1974 (prior to Preoperational Containment Leak Rate Testing). The ISI Boundary Diagram shall be revised to delete this piping from the ISI scope.
Alternate Testing:	No alternate testing is required.

HYDROSTATIC RELIEF REQUEST 7

Systems:	Reactor Building Closed Loop Cooling Water
Components:	Primary containment penetrations for the Reactor Building Closed Loop Cooling Water System
Code Class:	2
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition through Summer 1975 Addenda, Subsection IWC-5220(a) states, "that the system test pressure shall be 1.25 times the system design pressure." 2nd Interval ASME Section XI 1980 Edition through Winter 1981 Addenda, Paragraph IWC-5222(a) states: "The system hydrostatic test pressure shall be at least 1.10 times the system pressure Psv for systems with Design Temperature of 200°F (93°C) or less, and at least 1.25 times the system pressure Psv for systems with Design Temperature above 200°F (93°C). The system pressure Psv shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure P_D shall be substituted for Psv."
Basis for Relief:	Relief from the performance of hydrostatic testing is requested. These penetrations are tested as part of the system In-Service test performed on the Reactor Building Closed Loop Cooling Water, Emergency Service Water and Service Water Systems. This In-Service test meets the requirements of IWA-5211(c) of ASME Section XI 1980 Edition through the Winter 1981 Addenda. The Authority requests a system inservice test be performed in lieu of hydrostatic testing. These penetrations are used to supply cooling water to the Drywell Cooling Assemblies, Recirculation Pump Motor Coolers, and the Drywell Equipment Sump Cooler. As containment penetrations, the piping components between the containment isolation valves are subject to testing requirements of 10 CFR 50, Appendix J, Type C testing. This is a pneumatic test at 45 psig which is a very sensitive measure of component leakage. Based on the above justification, the Authority concludes that the proposed alternate testing would not result in a decrease in safety.

HYDROSTATIC RELIEF REQUEST 7 (Cont'd)

Alternate Testing:

In accordance with IWA-5211(c), an In-Service test at nominal operating pressure is performed for these containment penetrations. During normal operation these lines are pressurized and in use with RBCLC water at a pressure of about 125 psig. This is close to the design pressure of 150 psig. In addition, the piping components between containment isolation valves are subject to Local Leak Rate Testing (LLRT) in accordance with the Type C testing requirements of 10 CFR 50, Appendix J.

HYDROSTATIC RELIEF REQUEST 8

Systems:	HPCI and RCIC
Components:	The turbine steam exhaust lines from each turbine to the pressure suppression chamber (Torus)
Code Class:	2
Code Test Requirements:	1st Interval ASME Section XI 1974 Edition through Summer 1975 Addenda, Subsection IWC-5220 discusses the requirements for the Class 2 piping pressure tests. Included in this is the system hydrostatic test of 1.25 times the system design pressure (P_D). 2nd Interval ASME Section XI 1980 Edition through Winter 1981 Addenda, Paragraph IWC-5222(a) states: "The system hydrostatic test pressure shall be at least 1.10 times the system pressure Psv for systems with Design Temperature of 200°F (93°C) or less, and at least 1.25 times the system pressure Psv for systems with Design Temperature above 200°F (93°C). The system pressure Psv shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure P_D shall be substituted for Psv."
Basis for Relief:	These exhaust lines were not designed for hydrostatic testing. This is evidenced by the design pressure of the turbine seals (30 psig) and the interferences with other systems which would be encountered by attempting to install temporary closures on the turbine exhaust flanges. Relief was granted on November 10, 1988. See NRC letter, R. Capra to J. C. Brons (JAF-88-341).
Alternate Testing:	A system In-Service test is performed in lieu of the hydrostatic test. This test was performed in accordance with IWA-5211 of Section XI of the ASME Code (1980 Edition).

ATTACHMENT II

JUSTIFICATION FOR DELETION OF CLASS II AIR/NITROGEN SYSTEMS FROM THE ISI PROGRAM

NEW YORK POWER AUTHORITY
JAMES A FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

ATTACHMENT II

JUSTIFICATION FOR DELETION OF CLASS II-AUGMENTED AIR/NITROGEN SYSTEMS FROM ISI PROGRAM

Systems:

- Drywell Inerting, CAD and Purge System
- Containment Differential Pressurization System
- Breathing, Instrument and Service Air
- Containment Hydrogen Monitoring System
- Standby Gas Treatment System

Justification:

When the scope of the Inservice Inspection (ISI) program was developed, the above listed air/nitrogen systems were included. Upon further review, the Authority determined these systems did not fall into the scope of the ISI program. This determination was made as follows:

- 10 CFR 50.55a (g) (4), "Inservice Inspection Requirements," states, "Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) which are classified as ASME Code Class 1, Class 2 and Class 3 shall meet the requirements except design and access provisions and preservice examination requirements, set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code and Addenda ... to the extent practical within the limitations of design, geometry and materials of construction of the components."

- The footnotes to 10 CFR 50.55a states, "Guidance for quality group classifications of components ... may be found in Regulatory Guide 1.26..."

- Regulatory Guide 1.26, "Quality Group Classifications and Standards for Water-, Steam-, and Radiological-waste-containing Components of Nuclear Power Plants," applies, as indicated by its title, only to those systems which contain water, steam, and radioactive materials.

- In addition, Regulatory Guide 1.26 states, "Other systems not covered by this guide, such as instrument and service air, diesel engine and its generators and auxiliary support systems, diesel fuel, emergency and normal ventilation, fuel handling and radioactive waste management systems, should be designed, fabricated, erected, and tested to quality standards commensurate with the safety function to be performed."

Based upon the above information, the air/nitrogen systems listed above clearly do not fall under the guidance of Regulatory Guide 1.26 or in the scope of the ISI program. Portions of the above systems which are safety related are tested commensurate with their safety function. The FSAR and/or Technical Specifications require surveillance testing combined with the testing required by 10 CFR 50 Appendix J for portions of these systems which comprise the containment boundary.

Based upon the above, these systems are considered Safety Related - Non ASME Section XI and are not included in the FitzPatrick Inservice Inspection Program Plan.