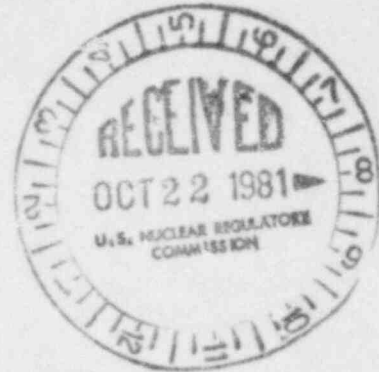


October 19, 1981

Docket No. 50-333

Mr. George T. Berry
President & Chief Operating Officer
Power Authority of the State
of New York
10 Columbus Circle
New York, New York 10019



Dear Mr. Berry:

SUBJECT: NUREG-0737, ACTION ITEM II.K.3.27 (COMMON REFERENCE LEVEL)

RE: JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Reference: (a) Letter from J. P. Bayne to T. A. Ippolito dated
April 10, 1981

We have reviewed your proposed modification (reference (a)) for the subject
Action Item. The criteria used in our review were:

1. All level instruments should be referenced to the same point.
2. Licensees should commit to modify documentation, including
operating procedures and technical specifications, as required,
to reflect the new reference level.
3. Licensees should commit to provide appropriate training for
plant operators.

Our review did not encompass a human factors evaluation of your water level
instrumentation (e.g., placement, legibility, etc.). That evaluation will
be performed as part of the detailed control room review (Action Item
I.D.1) that you will be expected to conduct per NUREG-0737 and NUREG-0700.

We find that, while your modification is an acceptable interim measure
with respect to the July 1, 1981 implementation date, it does not completely
resolve the concern upon which this Action Item is based. The rationale
of Action Item II.K.3.27 is that the operator should not have to perform
mental interpolations to understand what a reading on one water level
indicator means relative to a reading on another water level indicator.
Your modification makes information readily available that the operator
needs to perform a mental interpolation, but it does not eliminate the
need for performing the interpolation.

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SURNAME	PDR	ADOCK	05000333			
DATE	P	PDR				

Mr. George T. Berry

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Therefore, we request that you submit within 30 days of receipt of this letter:

1. Your commitment to install a modification that provides a common reference level during your fall 1981 outage and
2. A request for modification of your license that includes proposed technical specification changes, as required; a description of the modification; and your commitment to meet acceptance criteria 2 and 3 above.

Please contact your project manager if you have questions on this matter.

Sincerely,

Thomas A. Ippolito, Chief
 Operating Reactors Branch #2
 Division of Licensing

cc: See next page

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Mr. George T. Berry

cc:

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