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U. S. Nuclear Regulatory Commission
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Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50 - 333
Response to Verbal NRC Questions Regarding Surveillance Frequency in
Proposed Changes to the Technical Specifications for Remote Shutdown Panel
Components (JPTS-92-004) and Cable Tunnel Fire Protection (JPTS-92-019)

- References: 1. NYPA letter, R. E. Beedle to USNRC dated June 17, 1993,
(JPN-93-042) regarding "Proposed Change to the Technical
Specifications - Addition of Remote Shutdown Panel LCOs and
Surveillance Requirements (JPTS-92-004)."
2. NYPA letter, R. E. Beedle to USNRC dated December 22, 1993,
(JPN-93-082) regarding "Proposed Change to the Technical
Specifications to Reflect a Full Area Fire Suppression in the East
and West Cable Tunnels (JPTS-92-019)."

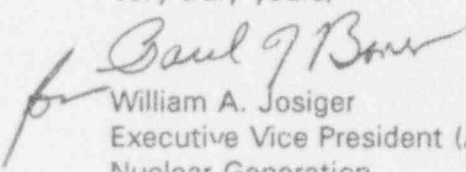
Dear Sir:

Attached are the Authority's responses to two questions asked by the NRC
Project Manager for FitzPatrick. These questions concern the surveillance frequency
for valves associated with cable tunnel fire protection, and remote shutdown panel
components, as related to two recently proposed changes to the Technical
Specifications (References 1 and 2).

Changes are necessary to correct one of the applications (Reference 1).
These changes are minor and will not significantly change the safety evaluation
or its conclusions. A revised application with these corrections will be submitted by
April 15, 1994.

If you have any questions, please contact J. A. Gray, Jr.

Very truly yours,


William A. Josiger
Executive Vice President (Acting)
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cc: See next page

ADDCK/1

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New York Power Authority
James A. FitzPatrick Nuclear Power Plant

Response to Verbal NRC Questions Regarding Surveillance Frequency in Proposed Changes to the Technical Specifications for Remote Shutdown Panel Components (JPTS-92-004) and Cable Tunnel Fire Protection (JPTS-92-019)

Question 1

On page 77m of Table 3.2-10 "Remote Shutdown Capability Instrumentation and Controls," your application (Reference 1) lists four notes associated with minimum surveillance frequency. "Note D" requires periodic testing to demonstrate that "each control circuit and transfer switch is capable of performing the intended function once per operating cycle."

- a. Why isn't "Note D" applicable to functions 1, 6, 7, 34, 35, 36, 37, 38, and 39?
- b. Why isn't "Note D" applicable to those functions 63 through 76 which are designated as meters?

Answer 1.a.

"Note D" was not specified for the 10 functions because they are not equipped with isolation switches. The reasons why isolation switches are not required for these functions are stated below:

Six instruments (1, 6, 7, 34, 35, and 36) are local panel instruments. The loops for these instruments do not include components or cables located within the control room.

Two instruments (37 and 39) are mechanical indicating devices (without electrical circuits) providing local indication. Because they are mechanical devices, isolation switches are not applicable.

Two instruments are identified for function 38. One instrument (02-3LI-58A) is a mechanical device (which does not have an electrical circuit) and therefore does not have a transfer/isolation switch. The other instrument (02-3LI-85B1) is a local indicator. It is not used in the current Appendix R safe shutdown strategy and will be deleted from the table in a revised amendment application.

Answer 1.b.

Six of the functions (64, 68, 69, 70, 71, and 73) in the group 63 through 76 are controls. "Note D" is designated in Table 3.2-10 as the surveillance frequency for these controls.

The surveillance for two instruments (65 and 74) will be changed from "Note B, C" to "Note D" because these instruments are equipped with isolation switches. This revision will not change the safety evaluation or conclusions in Reference 1.

Six functions share common transfer/isolation switches with other functions listed in the table, as identified below. The shared transfer/isolation switches are tested when "Note D" is applied to the shared functions in the table.

- Function 63 shares contacts with the isolation switch for function 59.
- Function 72 shares contacts with the isolation switch for function 68.
- Functions 66 and 67 share contacts with the isolation switch for function 60.
- Functions 75 and 76 share contacts with the isolation switch for function 69.

New York Power Authority
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Question 2

In Reference 2, Attachment II, on page 6 of 9 regarding valve cycling surveillance requirements, your application states:

"The proposed change requires testing every 6 months by cycling but clarifies that this does not imply full cycling. The testing frequency is consistent with current Technical Specifications and exceeds the annual testing frequency of Section 4.7.7.2 of the Standard Technical Specification. The frequency is less frequently than the quarterly testing required by NFPA 25-1992."

Clarify the basis for your proposed surveillance frequency in light of the more frequent testing required by NFPA.

Answer 2

The reference to NFPA 25-1992 was included in the application to provide a basis for comparing the proposed surveillance requirements to current industry standards. No commitment to this standard was intended.

The Authority's decision not to apply NFPA 25-1992 valve surveillance frequency considered the significant fire prevention, detection and extinguishing features in use at the FitzPatrick plant. The surveillance frequency of these valves is consistent with the surveillance frequencies previously approved for other plant equipment.

As stated in the submittal, the test frequency is consistent with the current FitzPatrick Technical Specifications and is twice the annual testing frequency the NRC approved in Section 4.7.7.2.b of the Standard Technical Specifications (NUREG-0123, Rev. 3, Fall 1980). The proposed surveillance frequency provides an adequate level of testing to ensure continued operability of the fire protection system.

References

1. NYPA letter, R. E. Beedle to USNRC dated June 17, 1993, (JPN-93-042) regarding "Proposed Change to the Technical Specifications - Addition of Remote Shutdown Panel LCOs and Surveillance Requirements (JPTS-92-004)."
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