James A. FitzPatrick
Nuclear Power Plant
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New York Power Authority

Harry P. Salmon, Jr.
Resident Manager

February 24, 1994
JAFP-94-0117

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555
ATTN: Document Control Desk

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Inspection 92-81 Notice of Violation and Notice of Deviation
Status of Commitments

Reference:
1. NRC letter, M. W. Hodges to H. P. Salmon, dated June 11, 1992, regarding NRC Inspection Report 50-333/92-81.
2. NYPA letter, H. P. Salmon to the NRC dated August 4, 1992 (JAFP-92-0578), regarding a revised response to Notice of Violation and Notice of Deviation - NRC Inspection 50-333/92-81.
3. NYPA letter, H. P. Salmon to the NRC dated July 13, 1992 (JAFP-92-0527), regarding the reply to Notice of Violation and Notice of Deviation NRC Inspection 50-333/92-81.
4. NRC letter, J. P. Durr to H. P. Salmon, dated September 9, 1992, regarding NRC Inspection Report 50-333/92-81.

Dear Sir:

This letter updates the status of the Authority's commitments made in Reference 2 in response to the Notice of Violation and Notice of Deviation resulting from the NRC Safety System Functional Inspection of the FitzPatrick Emergency Service Water System (Reference 1).

Attachments I and II summarize the status of the ten commitments made in response to the Notice of Deviation and the Notice of Violation respectively. Five of these commitments have been completed and five have been rescheduled. Attachment III outlines the commitments made in this letter.

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

Very truly yours,

Harry P. Salmon, Jr.
HPS/JAG/tlc
Attachments

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cc: U.S. Nuclear Regulatory Commission
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Attachment I to JAFP-94-0117
Updated Status of Commitments from Response to Notice of Deviation

This attachment provides the updated status of commitments made by the Authority in response to the NRC Safety System Functional Inspection of the Emergency Service Water System Notice of Deviation (Reference 1, Attachment IV).

Commitment

"FSAR Section 9.7-1 will be revised to include both the design specifications and the operability requirements of crescent area unit coolers. [Due date - 1993 FSAR Update]"

Status

The FSAR was updated to include this information in the July 1993 update. The design specified flow rate of 24 gpm is listed on Table 9.7-1 and the operability requirements were added to page 9.7-2.

In Reference 4, the NRC expressed a concern with the potential effects on the temperature profile of the crescent area of changing the required 24 gpm flow rate to an overall heat removal capability for each train of crescent area coolers. The resolution of the NRC concern is being documented by the Authority and is scheduled for completion on April 30, 1994. The FSAR will be updated as necessary.

Commitment

"The Authority has established a Nuclear Generation Business Plan Objective to review its internal procedures used to maintain and update the FSAR. ... [Due date - 9/30/92]"

Status

A review of Nuclear Generation Procedure NGP-26, "Final Safety Analysis Report Amendment Preparation and Control" and Nuclear Licensing Guideline NLG-13, "Final Safety Analysis Report (FSAR) Update Process" has been performed. As a result of this review, these procedures were revised and are currently in the final stages of review and approval. This task has been rescheduled for March 31, 1994.

Commitment

"...Included in this review will be an assessment of the FSAR level of detail based on recommendations in Reg Guide 1.70. [Due date - 9/30/92]"

Status

The Authority has completed a comparison of the level of detail in the FitzPatrick FSAR to the format and content detailed in Regulatory Guide 1.70. After evaluating the potential benefits and development costs, the Authority staff recommended that management not upgrade the FitzPatrick FSAR because there is no tangible benefit to be gained. The upgrade proposed by the assessment would only duplicate information already in the Design Basis Documents (DBDs) and would require the Authority to maintain the same information in DBDs and the FSAR.

The Nuclear Generation Business Plan Objective and Results Improvement Program Item established for this task will be closed upon management review and approval of this recommendation.

Commitment

"The Authority has established a Nuclear Generation Business Plan Objective to enhance the process for review and revision of the FSAR to reflect current plant configuration and Design Basis Documents. [Due date - 12/30/92]"

Status

Significant progress towards completion of this task has been made. However, additional actions are planned to further enhance the process for review and revision of the FSAR.

The FSAR update process now includes an additional review cycle. Each subchapter of the FSAR is assigned to a supervisory and senior/lead engineer, who are knowledgeable in the subchapter topic. The senior/lead engineers review their subchapter and all FSAR updates affecting their subchapter. All revisions to the subchapter are then evaluated by the assigned supervisor for completeness and technical accuracy.

In addition, the preparer of a Design Basis Document (DBD) is required to review all applicable sections of the FSAR and provide Licensing with any necessary FSAR change requests.

The Nuclear Generation Business Plan Objective and Results Improvement Program Item established for this task has been rescheduled for July 31, 1995.

Commitment

"The Authority will formally document the FSAR deviation in accordance with Nuclear Generation Procedure NGP-38."

Status

This action has been completed. A revision to Nuclear Safety Evaluation JAF-SE-90-067 was approved by the Plant Operating Review Committee (PORC) on September 11, 1992 to formally document the deviation.

Attachment II to JAFP-94-0117
Updated Status of Commitments from Response to Notice of Deviation

This attachment provides the updated status of commitments made by the Authority in response to the NRC Safety System Functional Inspection of the Emergency Service Water System Notice of Violation (Reference 1, Attachment II).

Commitment

"MCM-6A will be revised to ensure the appropriate personnel (System Engineers and/or Nuclear Generation Department) are assigned to the review. [Due date - 10/31/92]"

Status

This action has been completed. MCM-6A revision 2, dated December 15, 1992, incorporated guidance to ensure that the appropriate personnel are assigned to the review.

Commitment

"MCM-6A will be revised to provide additional guidance to ensure interfacing safety related systems are identified and evaluated during component classifications. [Due date - 10/31/92]"

Status

This action has been completed. MCM-6A revision 2, dated December 15, 1992, incorporated additional guidance to ensure interfacing safety related systems are identified and evaluated during component classifications.

Commitment

"Training on the revised procedure will be provided. [Due date - 12/31/92]"

Status

This action has been completed. Training on the revision to MCM-6A was provided on schedule.

Further incidents of incorrect classification of pressure boundary components have occurred since the completion of these items. The Authority has evaluated the need for further revisions to the procedure. Revisions will be completed by April 15, 1994.

Commitment

"Full compliance will be achieved when the service water / emergency service water pressure boundary supplying the control room and relay room chiller condensers and the chiller room air handling units are reclassified as QA Category I. Included in the upgrade is a revision to the Master Equipment List in accordance with procedure MCM-6A. An engineering evaluation verifying the acceptability of the installed components to meet QA Category I requirements is being performed in accordance with Engineering Design Procedure EDP-31 ... The Authority will complete the upgrade prior to startup from the 1992 refuel outage."

Status

This action has been completed. The service water / emergency service water pressure boundary supplying the control room and relay room chiller condensers and the chiller room air handling units have been reclassified as QA Category I. The Master Equipment List revision and the engineering evaluation verifying the acceptability of the installed components to meet QA Category I requirements were completed as part of the upgrade.

Commitment

"... a heating and air conditioning (HVAC) DBD is scheduled to be developed starting in September 1992."

Status

An HVAC Design Basis Document (DBD) is currently under development for FitzPatrick. The DBD is scheduled to be completed in October 1994.

Attachment III to JAFP-94-0117
Commitments

Commitment Number	Commitment	Due Date
JAFP-94-0117-01	Further incidents of incorrect classification of pressure boundary components have occurred since the completion of these items. The Authority has evaluated the need for further revisions to the procedure. Revisions will be completed by April 15, 1994.	April 15, 1994
JAFP-94-0117-02	Revise Nuclear Generation Procedure NGP-26, "Final Safety Analysis Report Amendment Preparation and Control" and Nuclear Licensing Guideline NLG-13, "Final Safety Analysis Report (FSAR) Update Process"	March 31, 1994
JAFP-94-0117-03	Document resolution of NRC concern with the potential effects on the temperature profile of the crescent area of changing the required 24 gpm flow rate to an overall heat removal capability for each train of crescent area coolers.	April 30, 1994
JAFP-94-0117-04	The Authority will develop a Heating, Ventilation, and Air Conditioning (HVAC) Design Basis Document (DBD).	October 1994
JAFP-94-0117-05	The Authority will develop further enhancements to the process for review and revision of the FSAR to reflect current plant configuration and Design Basis Documents.	July 31, 1995