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Harry P. Salmon, Jr.
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March 22, 1994
JAFF-94-0175

Richard J. Conte, Chief
BWR Section, Operations Branch
Division of Reactor Safety
Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406-1414

SUBJECT: NRC Inspection Report 50-333/94-03

Dear Mr. Conte:

Messrs. D. Florek and A. Burritt of your staff conducted an inspection on January 24 - 27, 1994, of activities associated with FitzPatrick plant operation. During the exit meeting the Authority agreed to provide responses to two inspector follow-up items.

1. 333/94-03-01; Provide the Authorities' position and basis for implementation of guidance provided in NRC Generic Letter 91-18 regarding surveillance testing and Technical Specification LCO statements.
2. 333/93-07-02; Provide both corrective actions and longer term EOP Program Enhancements regarding verification and validation of EOP support procedures.

Enclosures 1 and 2 provide the response. Please contact Mr. Donald Simpson (315-349-6361) if additional information is needed.

Very truly yours,

Harry P. Salmon, Jr.

HPS/ES/tlc
Enclosures

cc: R. Locy
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333/94-03-01, Generic Letter 91-18 implementation - Equipment Operability During Surveillance Testing

Short-Term Actions

The Authority agrees that safety equipment removed from service for surveillance testing and rendered incapable of performing its intended function is inoperable. On March 11, 1994, interim guidance was provided to operating shift management to enter the applicable Technical Specification LCO action statement in this situation except when the Technical Specification specifically directs otherwise. A listing of all applicable surveillance tests cross referenced to the applicable Technical Specification section and LCO duration has been provided for interim guidance. Operators are also directed to verify redundant train or component operability prior to entering a testing LCO. Entry into LCOs for surveillance testing in accordance with the interim guidance will begin on March 28, 1994.

The Authority review of instrument surveillance procedures indicates that for the majority of tests, entry into an LCO is not necessary based upon the following:

- Technical Specification Bases Section 3.1.A states, "When necessary, one channel may be made inoperable for brief intervals to conduct required functional tests and calibrations". This is consistent with allowed out of service times (AOTs) contained in Standard Technical Specifications. During these AOTs, there is no requirement to enter an LCO.
- Instrument surveillance tests are written and testing is scheduled so that only one instrument channel is tested at a time with the other channel(s) in operation. The surveillance tests trip the individual instrument channel which is its intended design function. Exceptions to this, such as testing of Excess Flow Check Valves, which remove more than one channel from service are performed only in the cold shutdown condition. Although an LCO is not entered, the prerequisite plant condition satisfies the LCO action statement.
- Instrument surveillance procedures that render equipment other than instrumentation inoperable (such as racking out the breaker for a valve) currently contain steps to enter the applicable LCO for that equipment or system.

333/94-03-01, Generic Letter 91-18 implementation - Equipment Operability During Surveillance Testing

Long-Term Actions

1. Interim guidance regarding LCO entry and verification of redundant system checks will be incorporated into the applicable test procedures. These changes will be completed by December 31, 1994.
2. A Technical Specification amendment to add allowed outage times for surveillance testing is planned to be submitted to the NRC by May 31, 1994.
3. Test procedures will be reviewed and further revised to remove the LCO entry requirement, if appropriate, once the Technical Specification Amendment is issued.

33/93-07-02, Verification and Validation of EOP Support Procedures

The Authority agrees that improvements in the verification and validation of EOP support procedures is appropriate. The following corrective actions have been completed. These actions are designed to improve the operators ability to implement EOP support procedures:

- AP-02.02, "Development of Emergency Operating Procedures*" was revised and issued for use on February 18, 1994. This revision requires the validation and verification of EOP support procedures and EOP protected steps using the criteria of NUREG-1358, Supplement 1 "Lessons Learned from the Special Program for Emergency Operating Procedures (conducted October, 1988 - September, 1991)".
- AP-02.01, "Procedure Writing Manual*" was revised and issued for use on March 13, 1994, to require that EOP protected steps be indicated as such within the procedure.
- All journeymen non-licensed operators have been trained and evaluated in the performance of EOP support tasks outside the Control Room. The training and evaluation which included the use of prestaged jumpers, terminal strip identification, jumper installation and management expectations concerning procedure compliance was completed as of February 28, 1994.
- All EOP support tasks that a non-licensed operator may be expected to perform were incorporated into the non-licensed operator training and qualification program on April 12, 1993.
- Relay Room and Control Room prestaged jumpers were labelled with their applicable procedure number as of February 28, 1994.
- Relay Room and Control Room panels that contain terminals where EOP support tasks are performed were labelled externally with bright orange labels consistent with EOP labeling in the plant. Terminal strips inside the panels were similarly labeled. These labeling tasks were completed as of 2/28/94.

33/93-07-02, **Verification and Validation of EOP Support
Procedures**

The following longer term actions will further enhance the operators ability to effectively implement the EOP support procedures in a safe, timely and efficient manner:

- EOP support procedures and EOP protected steps will be separated from the current Abnormal and Normal Operating procedures and a specific set of EOP support procedures created. This action will be completed in conjunction with the next EOP revision, currently scheduled for June, 1994.

- A plant modification to facilitate ease of jumper installation was issued in October, 1993. This modification will install banana type plug connectors at terminal strip locations where jumper application is necessary to support the EOPS. The modification installation will be completed prior to startup from the 1994 refueling outage.