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Harry P. Salmon, Jr. Resident Manager

March 31, 1994 JAFP-94-0186

Jacque P. Durr, Chief Engineering Branch Division of Reactor Safety United States Nuclear Regulatory Commission Region 1 475 Allendale Road King of Prussia, PA 19406-1414

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 93-16

Dear Mr. Durr:

This letter is being written to provide a schedule for completing the adequacy review of Surveillance Test procedures, in accordance with the subject inspection report.

The inspection report closed several unresolved issues related to Surveillance Test procedure adequacy since in all cases, when discrepancies were identified the systems tested satisfactorily. Although findings to date have not identified any significant safety issues, the NRC noted they expect all Surveillance Tests will be completed in a reasonable time and requested NYPA to provide a schedule for review of remaining tests.

Status of Adequacy Reviews:

At present, all Logic System Functional Tests have had an adequacy review per TSSO-18 "Surveillance Test (LSFT) Adequacy Review". This includes the following systems:

- RHR Containment Spray
- RHR Low Pressure Coolant Injection
- Avg. Power Range Monitoring
- Core Spray
- Automatic Depressurization
- Primary Containment Isolation
- Reactor Protection
- ATWS Recirc. Pump Trip
- Reactor Core Isolation Cooling
- High Pressure Coolant Injection
- Control Rod Blocks
- Emergency Diesel Generators

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All functional Fire Protection Surveillance Tests have had an adequacy review per AP-19.01, "Surveillance Testing Program". Surveillance Tests classified as non-functional, such as fire barrier penetrations have not yet been documented per AP-19.01 but are expected to be documented based on reviews by NED-Fire Protection by June, 1994. Much of the work required to perform adequacy reviews for these Fire Protection surveillance tests was done as part of the recently completed NFPA code walkdown effort.

Several other (approximately 15) ST procedures have had adequacy reviews performed per AP-19.01 due to major revisions or biennial reviews since AP-19.01 went into effect.

Scope of remaining STs requiring adequacy review:

An estimated five man-years effort remains to complete the balance of the adequacy reviews. This would include approximately 460 procedures currently identified in the Technical Specification Surveillance Matrix. The schedule will reflect reviewing systems based on a priority ranking developed for the System Performance Monitoring and Trending Program. This program ranks systems based on risk and regulatory significance. Completion of this effort is December, 1994.

Very truly yours,

HARRY P. SALMON, JR.

cc: M. Colomb R. Barrett

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