

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



CORBIN A. McNEILL, JR.
Resident Manager

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October 14, 1982
JAFP 82-1095

SERIAL:

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

Attention: Richard W. Starostecki, Director
Division of Project & Resident Programs

SUBJECT: NRC INSPECTION 50-333/82-19

Dear Mr. Starostecki:

With reference to the inspection conducted by Mr. J. Linville of your office on August 1-31, 1982, at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated September 14, 1982, as received by the undersigned on September 20, 1982.

RESPONSE TO NOTICE OF VIOLATION

A. The Power Authority agrees with this finding.

The fundamental cause of this violation was a difference in the interpretation of the wording of the Technical Specifications in that the action accomplished was considered to be a venting operation and separate and distinctly different from the action of purging. Additionally, an earlier commitment to vent through the Standby Gas Treatment (SBGT) System to maintain drywell to suppression chamber differential pressure had not been incorporated in plant procedure so as to provide permanency for implementation of the commitment.

The immediate corrective action was to stop venting the suppression chamber without utilizing the Standby Gas Treatment System. This action was completed on August 23, 1982.

The long term corrective action is to maintain the required differential pressure between the drywell and suppression

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chamber by venting only through an operating Standby Gas Treatment System. Full compliance was achieved on September 3, 1982.

The following additional information is provided as requested in the letter transmitting Inspection 82-19.

The inconsistencies between the James A. FitzPatrick Nuclear Power Plant Final Safety Analysis Report (FSAR), Appendix I submittal and our letter JPN-79-50 of August 15, 1979, and the manner in which we have operated the facility with the torus purge valves continuously open and the SBTG System secured result from the differences in the interpretation of the terms "vent" and "purge" as described above.

Operation with the torus exhaust valves normally open has been required since September, 1976, when the James A. FitzPatrick Nuclear Power Plant was required to maintain 1.7 psid differential pressure between the drywell and suppression chamber in order to reduce the suppression chamber loading when clearing the downcomers during a LOCA. Prior to this time the Plant was operated with torus exhaust valves in the closed position.

At the time the 1.7 psid differential pressure was imposed, it was thought to be a short term requirement and did not require a Technical Specification Amendment to Table 3.7-1. The subject then went unreviewed until June, 1982, when as the result of a request from the NRC to submit a Technical Specification Amendment associated with the purge valves, a Technical Specification Amendment was submitted.

B. The Power Authority agrees with this finding.

The fundamental cause of this violation was lack of management action to enforce the requirements of Indoctrination and Training Procedure 3, "General Employee Training," which requires annual requalification in Radiation Protection.

Immediate corrective action was taken as follows:

1. All Power Authority and contractor employees delinquent in requalification were notified of their delinquency and directed to complete training by October 12, 1982.
2. Personnel who had not completed requalification by October 12, 1982 had their security badges voided and were not allowed entry to the plant until completion of required training.

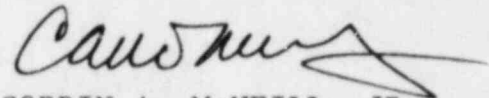
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Permanent corrective action was taken as follows:

1. Indoctrination and Training Procedure 3, "General Employee Training," has been revised such that an individual failing to attend annual requalification within twelve months of their last training, shall have their security badge removed with site access permitted for requalification training only.
2. The Program Administrator for General Employee Training has been counselled concerning the administration of Indoctrination and Training Procedure 3 and he has acknowledged that he will strictly adhere to the requirements contained therein.

Very truly yours,



CORBIN A. McNEILL, JR.

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