

UNITED ST. TES NUCLEAR REGULATORY COMMISSION

WASHINGTON D. C. 20556

February 14, 1991

Docket No. 50-333

Mr. John C. Brons Executive Vice President - Nuclear Generation Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Dear Mr. Brons:

SUBJECT: CONTAINMENT ISOLATION DEPENDABILITY, NUREG-0737, ITEM II.E.4.2, POSITIONS 1 THROUGH 4, FOR THE JAMES A. FITZPATRICK NUCLEAR POWER PLANT (TAC NOS. 68354, 64222, 75872, 73361)

The purpose of this letter is to consolidate the information related to NUREG-0737, Item II.E.4.2, Positions 1 through 4, for the James A. FitzPatrick Nuclear Power Plant which has been generated over the years to address plant and technical specifications changes related to the NUREG acceptance criteria.

By letter dated January 7, 1982, you indicated completion of a comprehensive review of the containment isolation dependability issue for the James A. FitzPatrick Nuclear Power Plant in accordance with NUREG-0737, Item II.E.4.2. You indicated that there were six non-essential systems which did not fully meet the NUREG-0737 acceptance criteria, outlined modifications which would be implemented, and indicated that once the modifications were completed you would be in full compliance with the criteria.

These non-essential systems are listed in the enclosure, along with a summary of the proposed modifications, a summary of the proposed technical specification amendments, and a summary of the safety evaluations which found the technical specification amendments acceptable. In the case of the Leak Rate Analyzer, no change to the technical specifications was needed and, therefore, no safety evaluation was performed.

By letter dated April 17, 1989, "Status of TMI Items," you indicated that all actions related to Item II.E.4.2 were satisfactorily implemented.

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SUMMARY OF NUREG-0737, ITEMS II.E, 4,2

Positions 1 Through 4

1. Reactor Water Cleanup (RCU) System

Non-Conformance Issue Identified by PASNY: Isolation valves MOV-15, MOV-18, and MOV-80 do not receive diverse isolation signals. Also, only one isolation valve in the line discharging to the feedwater system exists, two are needed to satisfy the criteria.

Modifications Proposed by PASNY: Modify the RCU system to provide a discharge isolation valve which satisfies the criteria (trip signal diversity, valve indication in the Control Room, testability and leakage determination), and provide diverse isolation signals to the isolation valves.

Technical Specification Amendment Submittal: By letter dated May 27, 1988, PASNY requested changes to the technical specifications in accordance with NUREG-0737, Item II.E.4.2. The changes would add a second Reactor Water Cleanup containment isolation valve (MOV-69) and diverse signals to the isolation valves (MOV-15, 18, 80, 69), which satisfy the criteria.

Safety Evaluation: Amendment No. 118 was issued November 10, 1988 (TAC No. 68354) which determined that the modifications were acceptable.

2. Traversing Incore Probe (TIP) System

Non-Conformance Issue Identified By PASNY: TIP nitrogen purge line contains only one isolation valve, two are needed to satisfy the criteria.

Modifications Proposed By PASNY: Modify the TIP purge line to add an isolation valve which satisfies the criteria (trip signal diversity, valve indication in the Control Room, testability and leakage determination).

Technical Specification Amendment Submittal: By letter dated January 3, 1987, PASNY requested changes to the technical specifications in accordance with NUREG-0737, Item II.E.4.2. The change would replace the check valve in the purge line with an isolation valve which meets the criteria.

Safety Evaluation: Amendment No. 108 was issued April 2, 1987 (TAC No. 64222) which determined that the modifications were acceptable.

regitional information: By letters dated January 12, 1990 and May 4, 1990, FASNY requested changes to the technical specifications to remove the purge line and associated valves. Amendment No. 161 (TAC No. 75872) was issued May 24, 1990, which determined that the changes were acceptable. Therefore, the purge line and isolation valves no longer exist.

3. Recirculation Pump Mini-Purge

Non-Conformance Issue Identified By PASNY: Mini-Purge lines contain only one isolation valve, two are needed to satisfy the criter's.

Modifications Proposed By PASNY: Modify the Recirculation Pump Mini-Purge line to replace the Mini-Purge valves with valves which satisfy the criteria (trip signal diversity, valve indication in the Control Room, testability and leakage determination).

Technical Specification Amendment Submittal: By letter dated January 3, 1987, PASNY requested changes to the technical specifications in accordance with NUREG-0737, Item II.E.4.2. The changes would replace the two existing check valves located outside the primary containment with one new solenoid-operated isolation valve inside and one outside the containment which satisfy the criteria.

Safety Evaluation: Amendment No. 108 (TAC No. 64222) was issued April 2, 1987, which indicated that the changes were acceptable.

4. Leak Rate Analyzer

Non-Conformance Issue Identified By PASNY: There are two isolation valves (101A and 101B) in series in the drywell pressure sensing line and two isolation valves (102A and 102B) in series in the torus pressure sensing line. One control switch operates the A valves and another switch operates the B valves. The criteria requires that reopening of containment isolation valves be performed on a valve-by-valve or line-by-line basis.

Modification Proposed By PASNY: Change the logic so that the 101A/B valves open independently of the 102A/B valves to eliminate ganged reopening.

Technical Specification Amendment Submittal: The plant changes, as outlined in the January 7, 1982 letter, to comply with the NUREG-0737 criteria did not require a change to the technical specifications.

Safety Evaluation: Since no technical specification change was needed to implement the change, no safety evaluation was performed.

5. Reactor Building Closed Loop Cooling Water

Non-Conformance Issue Identified By PASNY: Effluent lines from the primary containment only have single manual isolation valves located outside of the containment.

Modification Proposed By PASNY: Modify the effluent lines to incorporate power operated isolation valves with remote manual actuation.

Technical Specification Amendment Submittal: By letter dated May 31, 1989, PASNY requested changes to the technical specifications in accordance with NUREG-0737, Item II.E.4.2. The changes would add air-operated remote manual containment isolation valves which are operable from the Control Room.

Safety Evaluation: Amendment No. 150 (TAC No. 73361) was issued February 13, 1990, which indicated that the changes were acceptable.

6. Containment Vent and Purge

Non-Conformance Issue Identified By PASNY: Signals used to cause isolation of the primary containment vent and purge valves were not diverse.

Modifications Proposed By PASNY: Per Table 1 of the January 7, 1982 letter, addition of the high drywell radiation trip signal was necessary in order to comply with the NUREG-0737 criteria.

Technical Specification Amendment Submittal: By letter dated May 31, 1989, PASNY requested changes to the technical specifications in accordance with NUREG-0737, Item II.E.4.2. The changes would add Signal "H" (Containment High Radiation) to cause isolation of the containment vent and purge valves.

Safety Evaluation: Amendment No. 150 (TAC No. 73361) was issued February 13, 1990, which indicated that the changes were acceptable.

A review of the documents referenced in this summary, indicates that the James A. FitzPatrick Nuclear Power Plant meets the acceptance criteria of NUREG-0737, Item II.E.4.2, Positions 1 through 4. Therefore, this activity is considered complete for your facility.

Sincerely,

ORIGINAL SIGNED BY:

David E. LaBarge, Project Manager Project Directorate 1-1 Division of Reactor Projects - 1/II Office of Nuclear Reactor Regulation

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