

June 13, 1994
JPN-94-027

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Proposed Change to the Technical Specifications
Addition of Remote Shutdown Panel LCO and
Surveillance Requirements (JPTS-92-004)

REFERENCES: 1. NYPA letter JPN-93-042, R. E. Beedle to NRC, "Proposed Change to the Technical Specification - Addition of Remote Shutdown Panel LCOs and Surveillance Requirements (JPTS-92-004)," dated June 17, 1993.

2. NYPA letter JPN-94-010, W. A. Josiger to NRC, "Response to Verbal NRC Questions Regarding Surveillance Frequency in Proposed Changes to the Technical Specifications for Remote Shutdown Panel Components (JPTS-92-004) and Cable Tunnel Fire Protection (JPTS-92-019)," dated February 24, 1994.

Dear Sir:

The Authority is revising a docketed FitzPatrick Technical Specification amendment application (Reference 1) to incorporate Authority responses to questions from the NRC staff (Reference 2). Attachment I includes the revised proposed Technical Specification pages and a description of the specific changes being made. Attachment II contains the affected pages of the Safety Evaluation with revisions identified by change bars.

Specifically, the changes to the proposed Technical Specification pages are as follows:

- Expand LCO and Bases to clarify applicability and intent of this new specification.
- Delete an instrument from the table of remote shutdown panel instrumentation and controls (Table 3.2-10) which is not used for remote shutdown.
- Revise Table 3.2-10 to eliminate three columns containing redundant information.

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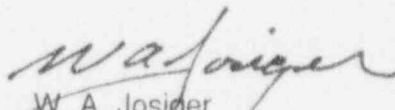
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- Add instrument identification numbers to eight line items in Table 3.2-10.
- Modify wording of notes in Table 3.2-10 to clarify intent of surveillance requirements and improve consistency with Standard Technical Specifications.
- Correction of a typographical error in a reference in the Bases to a surveillance requirement.

The changes to the Safety Evaluation consist of clarifications and editorial changes. The conclusion of no significant hazards consideration is not affected.

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

Very truly yours,


W. A. Josiger
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**Replacement Pages for Proposed Change to the Technical Specifications
Remote Shutdown Panel LCO and Surveillance Requirements (JPTS-92-004)**

DESCRIPTION OF CHANGES:

1. Page 54; Revise phrase "remote shutdown functions" in specification 3.2.J to read "remote shutdown instrument and control circuits." Also, add the phrase "in the Run and Startup/Hot Standby modes." Renumber this statement to be 3.2.J.1. The complete statement now reads:

1. The remote shutdown instrument and control circuits in Table 3.2-10 shall be operable in the Run and Startup/Hot Standby modes.

This revision clarifies the applicability of the LCO with respect to equipment and affected operating modes. Table 3.2-10 identifies individual instrument and control circuits which are subject to the new LCO and surveillance requirements. Also, the statement of applicable modes applies equally to all entries in Table 3.2-10. It is more appropriately included in the text of the LCO rather than as a footnote to the table.

2. Page 54; Renumber statement 3.2.J.1 to be 3.2.J.2. Add an option to permit temporary use of an alternate monitoring method and replace the word "function" with "instrument circuit". The revised statement reads as follows:

2. With one or more required instrument circuits inoperable:
 - a. restore the required instrument circuit to operable status within 30 days, or
 - b. establish an alternate method of monitoring the parameter within 30 days and restore the required instrument circuit to operable status within 90 days, or
 - c. be in hot shutdown within the next 12 hours.

The Standard Technical Specification allows 30 days to "restore the required function to operable status." The proposed specification for FitzPatrick allows 30 days to restore the instrument circuit or establish alternate means of monitoring which accomplishes the required function. A maximum time limit for use of alternate monitoring is specified, similar

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**Replacement Pages for Proposed Change to the Technical Specifications
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2. (continued)

to the approach used for Regulatory Guide 1.97 post-accident monitoring instrumentation. The allowable time limit for use of alternate monitoring in specification 3.2.H (accident monitoring) is 2.3 times the base limit allowed for restoration. The time limit proposed for this specification is 2.3 times 30 days and rounded up to 90 days.

Use of the term "instrument circuit" makes the LCO text consistent with Table 3.2.10 in that individual circuits are identified, not functions.

3. Page 54; Add two new statements to specification 3.2.J. Renumber 3.2.J.2 to be 3.2.J.5. The two new statements are:
3. With one or more required control circuits inoperable:
 - a. place the component actuated by that control circuit in the safe shutdown configuration, or
 - b. restore the required control circuit to operable status within 30 days, or
 - c. be in hot shutdown within the next 12 hours.
 4. Specification 3.2.J does not apply if the component actuated by a required control circuit is inoperable.

The purpose of the LCO is to establish conditions and surveillances for remote shutdown circuits, not for plant equipment which may already be covered by other specifications. The two added statements make this clarification and provide an alternate means to ensure that the shutdown function is fulfilled in the event that the remote shutdown control circuit is inoperable.

4. Page 77j, line item 38: Delete instrument 02-3LI-85B1. This instrument is a local indicator which is not used in the Appendix R safe shutdown strategy. It is not appropriate to include this indicator in a table of remote shutdown instrumentation.

Attachment I to JPN-94-027

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5. Table 3.2-10 (pages 77f through 77m) has been revised as follows to eliminate redundant information. No essential information has been deleted.
 - The third column, "Mode in which...", has been deleted. This column referred to Note A, which identified the same modes for every line item in the Table. The statement of applicable modes has been moved to 3.2.J as explained in item 1 above.
 - The fourth column, "Minimum Surveillance...", has been deleted. This column referred to Notes B, C, or D depending on whether the circuit contained an isolation / transfer switch or whether the instrument was normally energized. Notes B, C, and D are retained in the revised table. The details of applicability more appropriately belong in implementing plant procedures, not the Technical Specifications. Deleting this column does not eliminate the Surveillance Requirement.
 - The fifth column, "Minimum Required...", has been deleted. This column contained the same information for every line item in the table. This column has been replaced by a new Note A which contains the same information and applies to every item in the table.
 - Add "[Refer to Notes on Page 77m]" under Table title on each page of Table, except 77m, to refer user to Table Notes.
6. Pages 77l and 77m:

Add instrument identification numbers for line items 63, 65, 66, 67, 72, 74, 75, and 76.
7. Page 77m:

Revise Note B by deleting the phrase "(i.e., not requiring manual transfer/isolation for operation)." The revised note is clearer and consistent with the Standard Technical Specifications. Add sentence to itemize normally energized instruments.

Revise Note D to replace the word "transfer" with "transfer/isolation." This change clarifies that the requirement applies to circuits which contain either a transfer or isolation switch.

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**Replacement Pages for Proposed Change to the Technical Specifications
Remote Shutdown Panel LCO and Surveillance Requirements (JPTS-92-004)**

8. Page 60 and new page 60a:

First paragraph, second sentence; add "instrument rack 25-51".
This instrument rack is listed in the new Table 3.2-10 and should be included in the Bases.

Insert new paragraph after second paragraph:

This specification ensures the operability of the remote shutdown instrumentation and control circuits. Operability of components such as pumps and valves, which are controlled from these panels, is covered by other specifications. This specification does not impose conditions on plant operation which are more restrictive than those already imposed by other specifications. For example, Specification 3.7.D includes provisions for continued operation with one or more containment isolation valves inoperable. The 30 day time limitation imposed by 3.2.J would not apply in this situation, provided that the actions taken for the inoperable valve(s) to satisfy 3.7.D are also consistent with the safety function(s) required for fire protection.

Typographical correction: Change "Surveillance Requirement 4.2.J.2" to read "Surveillance Requirement 4.2.J" in 4th and 7th paragraphs. No 4.2.J.2 exists in the Technical Specifications nor was any such section proposed.

Editorial change: Change "uninhabitable" to read "inaccessible" in the 2nd and 7th paragraphs. Use of the term "inaccessible" is consistent with the Standard Technical Specifications.

Editorial change: Add the word "instruments" to the 1st sentence of the 3rd paragraph. The revised sentence reads, "Not all *instruments*, controls, and necessary transfer switches are located at the remote/alternate shutdown panels."

Editorial changes: Add the word "/ isolation" to the first sentence of the last paragraph (now on page 60a). The revised sentence reads, "Surveillance Requirement 4.2.J requires that each remote shutdown transfer / isolation switch and control circuit..." Replace the words "the isolation/transfer functions on" in the 2nd sentence of the last paragraph with "each remote shutdown control circuit". The revised sentence reads, "The requirements of this section apply to each remote shutdown control circuit on the panels..." These changes result in consistent use of terminology in the Bases and the new Table 3.2-10.