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J. Phillip Bayne
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June 29, 1984
JPN-84-43

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

Subject: James A. FitzPatrick (JAF) Nuclear Power Plant
Docket No. 50-333
Generic Letter 84-09
Recombiner Capability Requirements of
10 CFR 50.44(c)(3)(ii)

References: 1. NYPA letter, J. P. Bayne to D. B. Vassallo, dated June 29, 1983 (JPN-83-59).

2. BWROG letter, T. J. Dente to T. G. Eisenhut, dated June 21, 1982 - transmittal of Owners'Group technical position (NEDO-22155).

Dear Sir:

The New York Power Authority (NYPA) has determined that according to the criteria presented in Generic Letter 84-09, a recombiner capability is not required for the JAF facility.

As has been discussed previously in Reference 1, we have reviewed the generic study of combustible gas control submitted by the Mark I Owners Group (Reference 2), and have determined that it is applicable to our FitzPatrick facility. The results of this generic study show that, for all BWRs with inerted Mark I containments, peak containment oxygen concentrations are maintained below the combustible gas limits at all times without requiring containment venting or hydrogen recombiners.

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JAF Technical Specifications (T.S.3.7.A.6, pg. 180) require drywell inerting to < 4% oxygen during power operation. JAF uses the change of mode switch position from STARTUP to RUN as the point where inerting must be complete within 24 hours. JAF also starts to de-inert up to 24 hours prior to the mode switch being shifted out of RUN (based on the estimated time the mode switch will be shifted). During operation it is normal practice to maintain the oxygen concentration in the drywell in a range of 2% to 3%.

During power operation when the primary containment is inerted, the drywell to suppression chamber differential pressure is maintained at least 1.7 psid. Nitrogen is periodically added to the drywell in order to make up for any leakage during surveillance testing of vacuum breakers and any other leakage through penetrations or sample lines.

Other than the oxygen resulting from radiolysis of the reactor coolant, the following potential sources of oxygen in containment have been considered:

1. Instrumentation

   JAF drywell instrumentation (safety relief valves, main steam line isolation valves, drywell cooler dampers and transversing incore probe purge) has the capability to use either nitrogen or air. Although nitrogen is normally used when the drywell is inerted, present procedures do not require that only nitrogen be used. The Authority will, therefore, revise the scram and isolation recovery procedures to require that only nitrogen be used when possible during normal and post-isolation conditions. These procedures are scheduled to be revised by July 31, 1984.

2. Service Air & Breathing Air

   To prevent air inleakage through the service air and breathing air penetrations, the following verifications are performed:

   a. The Startup and Shutdown procedure specifically states to perform surveillance procedure ST-15H "Primary Containment Integrity Manual Isolation Valve Position Verification" and verify the service air and breathing air quick disconnects are disconnected before increasing to rated power.

   b. ST-15H verifies that the isolation valves for breathing and service air are closed and again that the disconnects are removed.

   c. In the startup/shutdown procedure, each system's valve lineup must be checked against its specific operating procedure in which, again, the isolation valves are verified closed.

Although service air and breathing air are normally disconnected, current JAF procedures do not require isolation valves to be locked shut. Procedures will, therefore, be revised to require locking of the valves. These revisions are scheduled to be completed by July 31, 1984.

3. Instrument Air

This is discussed above.

4. Electrical Penetrations

These are pressurized with dry nitrogen.

FitzPatrick has no inflatable door seals or air-pressurized MSIV leakage control system.

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

Very truly yours,

Robt A Bayne for

J. P. Bayne
Executive Vice President
Nuclear Generation

cc: Office of the Resident Inspector
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