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J. Phillip Bayne First Executive Vice President Chief Operations Officer

April 1, 1985 JPN-85-24

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 Nuclear Power Plant Docket No. 50-333 NUREG-0737 Item II.K.3.28 Qualification of Accumulators on Automatic Depressurization System Valves
- References: 1. NYPA letter, J. P. Bayne to D. B. Vassalio, dated September 4, 1984 (JPN-84-58).
  - NRC letter, D. B. Vassallo to J. P. Bayne, dated July 16, 1984.

Dear Sir:

This letter clarifies the Authority's response (Reference 1) to the NRC's Request for Additional Information (Reference 2).

NUREG-0737 - Item II.K.3.28 requires that the ADS valves, accumulators and associated equipment and instrumentation be capable of performing their functions during and following exposure to hostile environments for periods up to 100 days without taking credit for non-safety related equipment or instrumentation.

The Authority has confirmed that the ADS valves, accumulators and piping, with the exception of the accumulator check valves, are environmentally and seismically adequate. The existing check valves will be replaced with environmentally and seismically qualified valves during the current outage. In accordance with the NRC staff evaluation (Reference 2), this is sufficient to meet the short term ADS operability requirements.

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A046 110 During the 1986 refueling outage, the Authority will upgrade the ADS accumulator system to remain functional for periods up to 100 days following a postulated accident. This will be accomplished either by providing an environmentally and seismically qualified back-up system to recharge the accumulators for long term operation or by providing redundant, safety-related pneumatic sources to actuate the ADS valves.

The most effective modification to meet NUREG-0737 - Item II.K.3.28, long term ADS operability requirement, will be selected upon conclusion of an engineering study scheduled to be completed in 1985.

After completion of the modifications chosen, the FitzPatrick plant will meet all the requirements of NUREG-0737 - Item II.K.3.28.

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

Very truly yours,

J. P. Bayne First Executive Vice President Chief Operations Officer

cc: Office of the Resident Inspector