



William J. Cahill, Jr.
Chief Nuclear Officer

March 22, 1996
JPN-96-010

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

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
**Proposed Change to the Technical Specifications
Regarding Core and Containment Cooling System
Initiation and Control Instrumentation (JPTS-96-002)**

- REFERENCES:
1. NRC letter, C. E. Carpenter, Jr. to W. J. Cahill, Jr., dated September 11, 1995, issuing Amendment 227 to the James A. FitzPatrick Technical Specifications.
 2. NRC letter, C. E. Carpenter, Jr. to W. J. Cahill, Jr., dated December 11, 1995, regarding "Correction to Amendments 227 and 228 for the James A. FitzPatrick Nuclear Power Plant."

Dear Sir:

This application for an amendment to the James A. FitzPatrick Technical Specifications (TS) proposes changes to TS Table 3.2-2, "Core and Containment Cooling System Initiation and Control Instrumentation Operability Requirements." The proposed changes will clarify operability requirements for 4kV Emergency Bus Undervoltage Trip Functions.

By letter dated September 11, 1995 (Reference 1), the NRC issued Amendment 227 to the FitzPatrick TS. This amendment included extensions to the allowed outage times (AOTs) for emergency core cooling system (ECCS) actuation instrumentation. Prior to implementation of Amendment 227, the Authority discovered an error relating to AOT extensions for 4kV Emergency Bus Undervoltage Trip Functions associated with TS Table 3.2-2. Specifically, the AOT extensions for these trip functions were not consistent with the requirements of Standard Technical Specifications (STS), NUREG-1433, and differed from the recommendations in the associated Licensing Topical Report. The Authority committed to implement administrative measures to ensure AOT extensions were not applied to these trip functions, and to submit an amendment application to clarify the operability requirements for these trip functions.

By letter dated December 11, 1995 (Reference 2), the NRC concurred with the Authority's interpretation that AOT extensions were not appropriate for these trip functions and agreed with the Authority's committed course of action.

Additional changes are proposed to TS Table 3.2-2 and to TS Table 4.2-2, "Core and Containment Cooling System Instrumentation Test and Calibration Requirements." These changes will: (1) replace the generic actions for inoperable instrument channels with function-specific actions, (2) replace the generic test AOT with function-specific test AOTs, and (3) relocate selected trip functions from the TS to an Authority controlled document. This will ensure consistency with STS, simplify the use of TS, and facilitate STS conversion by minimizing the differences between current TS and STS. The changes will also enhance safety by ensuring that an inoperable instrument channel is not placed in the tripped condition when this condition is not a safe state for the channel.

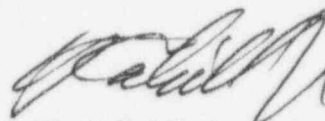
The signed original of the Application for Amendment to the Operating License is enclosed for filing. Attachment I contains the proposed new TS pages and Attachment II is the Safety Evaluation for the proposed changes. A markup of the affected TS pages is included as Attachment III. Attachment IV lists the commitments contained in this submittal.

A copy of this application and the associated attachments is being provided to the Designated New York State Official in accordance with 10 CFR 50.91.

The Authority requests implementation of this amendment within 60 days of issuance, to allow time for operator training and procedure revisions.

If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,



W. J. Cahill, Jr.
Chief Nuclear Officer

att: as stated

cc: next page

cc: Regional Administrator
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