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October 21, 1985  
JPN-85-76

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  
Inservice Test Program

- References:
1. PASNY letter, J.R. Schmeider to T.A. Ippolitto, dated February 13, 1980 (JPN-80-08) regarding inservice inspection program for pumps and valves.
  2. NRC letter, T.T. Martin to C.A. McNeill, Jr., dated May 16, 1983 regarding NRC Inspection No. 83-10.
  3. NRC letter, D.B. Vassallo to J.P. Bayne, dated December 5, 1983 regarding Safety Evaluation of Requests for Relief from Inservice Testing Requirements.

Dear Sir:

Section 50.55a(g) of 10 CFR Part 50 requires that the Authority revise its Inservice Test (IST) Program at 120 month intervals beginning with the start of commercial operation. The first FitzPatrick IST Program was submitted in September of 1978 and a meeting was held with the NRC Staff in April of 1979. Significant changes to the program were made as a result of this meeting and it was resubmitted in February of 1980 (Reference 1).

Between 1979 and 1983, the Authority corresponded with the NRC to further clarify and resolve open issues concerning the IST program. In April of 1983, the NRC Office of Inspection and Enforcement conducted an inspection and issued its inspection report (Reference 2) in May of that year. The IST program Safety Evaluation (Reference 3) was issued seven months later in December of 1983. The Safety evaluation granted relief from certain ASME Code requirements and listed additional actions required of the Authority during the first ten year program.

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Although the second IST interval started on July 28, 1985, the Authority has not yet submitted, to the NRC, the FitzPatrick IST Program for the second ten-year interval or the response to the Safety Evaluation for several reasons. Preparation of the IST program began in August of 1984, however the responsible plant and headquarters personnel had to finish outage-related work before completing the IST program and SER response. A seven-week outage was held in the fall of 1984 to perform IHSI (Induction Heating Stress Improvement) on recirculation system piping to minimize the potential affects of Intergranular Stress Corrosion Cracking (IGSCC). A major refueling outage was held just three months later in early 1985. Subsequent startup difficulties further contributed to the delayed completion of the program and our response.

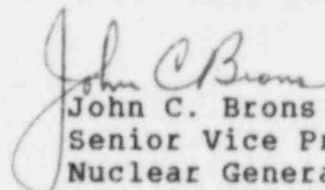
Secondly, we have had difficulty resolving issues raised during Inspection No. 83-10 which also limited progress on the new program. Authority personnel recently discussed program requirements with your staff at some length. Some issues were resolved; others will be addressed in the final program.

The Authority is in the final phases of completing the second IST program for FitzPatrick. This program will be submitted no later than November 15, 1985. We also plan to respond to the SER and further justify why specific relief requests should be granted. Our SER response will be submitted no later than December 1, 1985.

In addition, the Authority hereby requests that the Commission extend the previously approved code reliefs which expired July 27, 1985. This additional time is necessary to assure consistent interpretations of IST program requirements. Every attempt is being made to incorporate the provisions of the SER (Reference 3) into the new IST program.

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

Very truly yours,

  
John C. Brons  
Senior Vice President  
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cc: Office of the Resident Inspector  
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