

James Knubel
Senior Vice President and
Chief Nuclear Officer

July 15, 1997
JPN-97-023

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
**Inservice Inspection Program Relief Requests for the
Second Ten-Year Interval Closeout and Revised Summary Report**

- REFERENCES:
1. NYPA letter, J. Knubel to NRC (JPN-97-020), "Extension for the Submittal of the Inservice Inspection Closeout Report," dated June 2, 1997.
 2. NYPA letter, J. Knubel to NRC (JPN-97-009), "Inservice Inspection Summary Report - 1996 Refuel Outage (Reload 12/Cycle 13)," dated March 4, 1997.
 3. NYPA letter, Harry P. Salmon, Jr. to NRC (JAFP-92-0463), "LER-92-022-00 - ASME Class III Pressure Tests Performed for 10 Minutes Vice 4 Hours," dated June 15, 1992.
 4. NYPA letter, W. J. Cahill, Jr. to NRC (JPN-96-050), "Request for Relief From ASME Section XI Code Regarding Implementation Schedule For Containment Repair/Replacement Requirements," dated November 26, 1996.
 5. NRC letter, Karen R. Cotton to James Knubel, "Request for Additional Information Regarding Relief Request From Implementation of 10 CFR 50.55a Related to Containment Repair/Replacement Requirements - James A. FitzPatrick Nuclear Power Plant (TAC No. M98061)," dated June 25, 1997.

Dear Sir:

This letter submits a revised Inservice Inspection (ISI) summary report (Attachment I) for the 1996 refuel outage (Reload 12/Cycle 13) and the ISI relief requests for the second ten year interval closeout (Attachment II), as committed to in Reference 1.

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Attachment I contains a revised Inservice Inspection (ISI) Summary Report for the James A. FitzPatrick Nuclear Power Plant (Commercial Service Date: July 28, 1975). The original report (Reference 2) was submitted as required by Article IWA-6230 of Section XI of the ASME Boiler and Pressure Vessel Code.

Attachment II requests relief in accordance with 10 CFR 50.55a(a)(3) of the Commission's regulations for the Second Ten-Year Interval Inservice Inspection (ISI) Program at the James A. FitzPatrick Nuclear Power Plant. The relief requests apply to selected welds / components whose inspections have been determined to be impractical. The second ten-year inspection program is based on Section XI, 1980 Edition with Addenda through Winter 1981, of the ASME Boiler and Pressure Vessel Code, as modified for relief requests approved by the NRC. The inspection interval ends September 30, 1997.

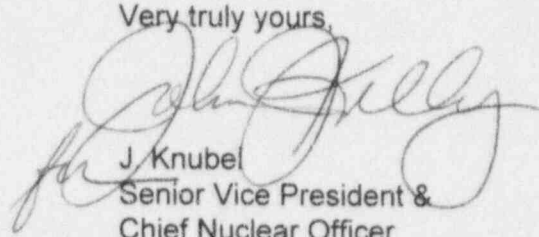
For examinations determined to be impractical by the licensee, the regulations (10 CFR 50.55a(g)(5)) require that the basis for this determination be demonstrated to the satisfaction of the Commission not later than 12 months after expiration of the inspection interval. Attachment II contains the specific relief requests for which the Authority seeks NRC approval. With three exceptions, these reliefs discuss examinations which were impractical due to the inaccessibility or the physical configuration of the inspected welds / components.

The first exception (Code Category C-H, D-A, D-B, D-C) involves a failure to establish the code required hold times for some of the pressure tests conducted on Class 2 and 3 systems during the first inspection period of the second ten-year inspection interval. The pressure tests were conducted in accordance with the code during the second and third inspection periods as discussed in Attachment II. This event was documented in Reference 3. The other two exceptions relate to Code Category B-K-1, item number B10.10 (piping integrally welded attachments) and Code Category B-G-1, item number B6.40, (RPV threads in flange). Specifically, for item B6.40, 22 examinations were missed due to an administrative oversight and a code interpretational discrepancy. Alternative inspection requirements are proposed in the relief request. For item B10.10, relief is requested to utilize ASME Code Case N-509 (in lieu of the requirements in ASME Code Section XI, 1980 Edition through Winter 1981 Addenda).

Attachment II also contains a supplement to the relief request, submitted by Reference 4, regarding containment repair and replacement activities. This supplement provides additional information concerning the reasons for this relief request and discusses the procedures currently in place to ensure that containment repair and replacement activities provide adequate safety of the containment and that proper quality assurance requirements are implemented. This supplement provides the information requested by Reference 5.

Attachment III lists the commitment made in this submittal. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'J. Knubel', is written over the typed name and title.

J. Knubel
Senior Vice President &
Chief Nuclear Officer

Attachments: as stated

cc: Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Office of the Resident Inspector
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Ms. K. Cotton, Acting Project Manager
Project Directorate I-1
Division of Reactor Projects-I/II
U. S. Nuclear Regulatory Commission
Mail Stop 14 B2
Washington, DC 20555

ATTACHMENT I TO JPN-97-023

**JAMES A. FITZPATRICK NUCLEAR POWER PLANT
REVISED INSERVICE INSPECTION SUMMARY REPORT
1996 REFUEL OUTAGE (RELOAD 12/CYCLE 13)**

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

ATTACHMENT II TO JPN-97-023

**JAMES A. FITZPATRICK NUCLEAR POWER PLANT
INSERVICE INSPECTION PROGRAM RELIEF REQUESTS FOR THE 2ND TEN YEAR
INTERVAL CLOSEOUT**

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

ATTACHMENT III TO JPN-97-023

COMMITMENT LIST

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

COMMITMENT LIST

Commit. No.	Commitment	Due Date
JPN-97-023	Inspect the 22 RPV Threads in Flange, not inspected during the second ten year interval, during the third ten year interval, first period, first refueling outage (RO13). (Code Category B-G-1, Item No. B6.40) These inspections will be performed in addition to the third ten year ISI requirements.	Refueling Outage 13