

John C. Brons
Executive Vice President
Nuclear Generation

May 13, 1988
JPN-88- 019

U. S. Nuclear Regulatory Commission
Attn. Document Control Desk
Washington, D. C. 20535

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Main Control Room Emergency Ventilation
System Technical Specifications

- References: 1. NRC letter, H. Abelson to J. C. Brons dated
February 17, 1988, regarding Amendment 114 to
Technical Specifications.
2. NYPA letter, J. C. Brons to D. R. Muller
dated December 19, 1986, (JPN-86-059)
regarding NUREG-0737, Item III.D.3.4,
"Control Room Habitability Requirements."

Dear Sir:

In Reference 1, the NRC staff approved an amendment to the FitzPatrick Technical Specifications that requires capacity testing of the Main Control Room Emergency Ventilation System (MCREVS) every eighteen months. That letter further requested that the Authority propose revised Limiting Conditions for Operation (LCOs) for the MCREVS filters or justify an alternative LCO.

Reduced allowable outage times (LCOs) for the FitzPatrick MCREVS would not increase safety nor reduce risk. As demonstrated in Reference 2, existing specifications are already comparable with, and in some cases more restrictive than, the NRC's Standard Technical Specifications (STS).

FitzPatrick's MCREVS filters have had an excellent availability record. A review of work request records demonstrates a 100 percent availability for the three-year period ending December 31, 1987 (i.e. at no time during this period were both filter trains unavailable). The worst-case availability (for a single train) was approximately 99.75 percent. The 0.25 percent unavailability is solely attributable to removing the system from service for planned maintenance (7 to 14 hours per

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system from service for planned maintenance (7 to 14 hours per year per filter train) and surveillance testing to comply with Technical Specifications (8 hours per year per train). No failures or corrective maintenance were recorded during this period.

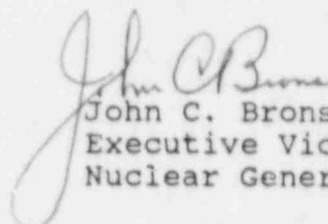
Generic Letter 83-36 (NUREG-0737 Technical Specifications) does not require adoption of STS. The Generic Letter stated that the "sample" STS included in Enclosure 3 were "for your information only." Clearly, STS are guidance, not requirements.

In as much as the LCOs included in the STS are not based on an engineering assessment or developed through a quantifying methodology, compliance with them may not represent an improvement in plant operations. Existing FitzPatrick LCOs and surveillance requirements have been exhaustively justified. They are adequate to assure the continued health and safety of the public.

Despite this, the Power Authority will submit a proposed license amendment to reduce MCREVS allowable outage times to fourteen days with one filter train inoperable, and three days with both trains inoperable.

If you or your staff have any questions concerning this matter, please contact Mr. J. A. Gray, Jr. of my staff.

Very truly yours,


John C. Brons
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cc: U. S. Nuclear Regulatory Commission
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