

James A. FitzPatrick
Nuclear Power Plant
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Michael J. Colomb
Site Executive Officer

October 1, 1998
JAFP-98-0319

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Commitment Change Regarding Surveillance on Locked Valves

References: See Below

Dear Sir:

The Authority is revising a commitment regarding surveillance on locked valves at the James A. FitzPatrick Nuclear Power Plant. The Authority committed to verify proper valve positions and lock status on accessible locked valves once per month in a response (Reference 1) to a NRC Notice of Violation (NOV) (Reference 2).

This commitment was modified in 1988 (Reference 3) based on a NOV described in Inspection Report 88-01 (Reference 4). Specifically, the Authority committed to change the locked valve surveillance test frequency to require performing this surveillance prior to start up in addition to the monthly frequency which was in use at that time.

With this letter, the Authority is changing the locked valve surveillance test frequency to require performing this surveillance semiannually and prior to startup from a refueling outage. The Authority believes that the satisfactory surveillance test results over a 24 month period for locked valve verification and the dose savings gained (Approximately 10 millirem per test) in lowering the surveillance test frequency provides good cause for this commitment change. This commitment change is administrative in nature, will not negatively impact the ability of a structure, system or component to perform its intended safety function, and is consistent with Nuclear Energy Institute guidance (Reference 5) regarding managing commitments.

The Authority is not changing the monthly locked valve surveillance test requirements identified in the fire protection program or identified in the Technical Specifications as part of this commitment change.

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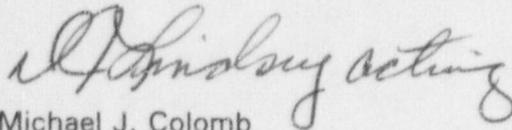
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Attachment 1 contains the commitments made by the Authority in this letter. If you have any questions, please contact Mr. Art Zaremba.

Very Truly Yours,



Michael J. Colomb
Site Executive Officer

MJC:JJC:las

References:

1. PASNY Letter, J. D. Leonard, Jr. to the NRC, Reply to Notice of Violation, (JAFF-78-347), dated July 11, 1978
2. NRC letter to the Power Authority of the State of New York, "Inspection 50-333/78-12," dated June 23, 1978
3. NYPA Letter, R. J. Converse to the NRC, "Inspection No. 88-01," (JAFF-88-0384), dated April 25, 1988
4. NRC Letter to the Power Authority of the State of New York, "Inspection Report No. 50-333/88-01," dated March 29, 1988
5. NEI's Guideline for Managing NRC Commitments, Revision 2, dated December 19, 1995

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
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Mr. J. Williams, Project Manager
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Attachment 1 to JAFP-98-0319

LIST OF COMMITMENTS

Commitment No.	Description	Due Date
JAFP-98-0319-01	Verify proper valve positions and lock status on accessible locked valves semiannually and prior to startup from every refueling outage. Monthly locked valve surveillance test requirements identified in the fire protection program or identified in the Technical Specifications are still required.	Date of this letter