

James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315 342.3840



Radford J. Conners
Resident Manager

September 16, 1988
JAFF-88-0869

United States Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555
Attn: Document Control Desk

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Inspection No. 88-12

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A, Notice of Violation, transmitted by your letter dated August 18, 1988. This refers to the inspection 88-12 conducted by the Resident Inspectors, Mr. A. Luptak and Mr. R. Plasse on June 18, 1988 to August 7, 1988, at the James A. FitzPatrick Nuclear Power Plant.

Notice of Violation

As a result of the inspection conducted on June 12, 1988 to August 7, 1988, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C) the following violation was identified:

Technical Specification 4.0.B requires that surveillance requirements be performed within the specified time interval with an allowable variation of +25% of the surveillance interval.

Technical Specification 4.6.D requires that reactor coolant leakage rate inside the primary containment shall be monitored and recorded once every four hours, utilizing the Primary Containment Sump Monitoring System.

Contrary to the above, on June 27, 1988, the reactor coolant leakage rate was not calculated and recorded between 4:00 a.m. and 12:00 p.m., missing the surveillance requirement once.

This is a Severity Level V Violation (Supplement I)

Response to Notice of Violation

The Authority agrees with the findings specified in the violation. As discussed in Inspection Report 88-12 the reactor coolant leakage rate inside the primary containment was not calculated and recorded between 4:00 a.m. and 12:00 p.m. on

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June 27, 1988. The control room operator did observe the drywell sump level recorders, located in the front panel area of the control room, during the four hour period following the missed 8:00 a.m. calculation, and would have detected any change in reactor coolant leakage rate. When the 12:00 p.m. readings were taken a leakage calculation was then made for an eight hour period instead of the normal four hour period. The leakage calculated at 12:00 p.m. was well within the Technical Specification limits.

A critique was conducted to determine the cause of the missed readings. To obtain the readings to calculate the leakage rates, both the equipment and floor drain sumps are pumped down. To pump down the equipment drain sump a relay (located in a control cabinet in the Relay Room, directly below the Control Room), must be manually actuated to allow the drywell equipment drain sump to pump down. The drywell floor drain sump can be pumped down manually at a Control Room front panel. After pumping down the sumps, flow integrator readings are taken for both drywell equipment and floor drains. These integrator readings are taken at a Control Room back panel. The previous readings are subtracted from the present readings to obtain the total volume of water pumped from each sump. The total volume (in gallons) is then divided by 240 minutes (for a four hour calculation) to obtain a gallon per minute (GPM) leakage rate for each sump.

Because the control room operator cannot leave the control room front panel area, the equipment drain system relay actuation and integrator readings must be performed by another member of the operating shift. This has been handled differently by different operating shifts. On some shifts an auxiliary operator actuates the relay in the relay room and a second shift licensed operator takes the integrator readings. On other shifts the auxiliary operator performs both functions and completes the calculation. Regardless of which method is used to complete this evolution, it is the responsibility of the control room operator to ensure the data is taken, the necessary calculations completed and the leakage recorded.

When this event took place, one of the shift positions was being covered by an auxiliary operator from another shift. On his shift the auxiliary operator only actuated the relay for the equipment drain sump. For the shift that was on at the time, the auxiliary operator performed the entire evolution. The control room operator did not verify that the 8:00 a.m. drywell leakage calculations had been made and recorded as required by Technical Specification 4.6.D.

Corrective Action:

The following corrective actions have been performed to ensure a similar event will not take place:

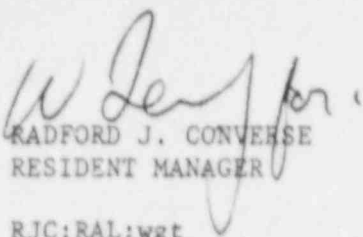
1. The control room operator's responsibility to ensure this surveillance is completed was emphasized to all operators.

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2. A modification has been designed which will no longer require actuating the relay from the relay room to pump the equipment sump down. This modification is being installed during the present refueling outage.

Very Truly Yours,



BRADFORD J. CONVERSE
RESIDENT MANAGER

RJC:RAL:wgt

CC: W. Fernandez
R. Patch
PORC Members

NRC Resident Inspector
DCC
RMS-WPO

E.C. Wenzinger
NRC Region I Office
NRCI 88-12 File