

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

October 16, 1998
JAFF-98-0338

United States 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
Request for Additional Information Regarding Generic Letter 96-05

- References:
1. NYPA Letter, M. Colomb, to NRC (JAFF-98-0186), Updated Response to Generic Letter 96-05, dated June 2
 2. NRC Letter, J. Williams (NRC) to J. Knubel (NYPA), Request for Additional Information Regarding Generic Letter 96-05, dated September 22, 1998

Dear Sir:

In Reference 1, the Authority provided an updated response to Generic Letter (GL) 96-05 for the FitzPatrick Plant indicating the intent to implement the provisions of the Joint Owner's Group (JOG) Program on motor-operated valve (MOV) periodic testing. In Reference 2, the NRC requested additional information to allow completion of the NRC review of the Authority's Generic Letter 96-05 response. Attachment 1 provides the Authority's response to the NRC request.

Attachment 2 provides a summary of commitments.

If you have any questions, please contact Mr. Arthur H. Zaremba at (315) 349-6365.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Michael J. Colomb'.

MICHAEL J. COLOMB

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Attachments as stated

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cc: Regional Administrator
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Mr. Joseph Williams, Project Manager
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Attachments

1. Response to Request for Additional Information Regarding Generic Letter 96-05
2. Summary of Commitments

New York Power Authority – James A. FitzPatrick
Response to Request for Additional Information Regarding Generic Letter 96-05

Page 1 of 3

Question 1

In NRC Inspection Report No. 50-333/95-20, the NRC staff closed its review of the motor-operated valve (MOV) program implemented at the James A. FitzPatrick Nuclear Power Plant in response to Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance." In the inspection report, the NRC staff discussed certain aspects of the licensee's MOV program to be addressed over the long term. For example, the inspectors noted that (1) the licensee would need to review its use of test data from the Electric Power Research Institute (EPRI) based on the NRC staff conclusions on the EPRI program that were subsequently provided in the NRC safety evaluation (SE) dated March 15, 1996, and its supplement dated February 20, 1997; (2) the licensee planned to adjust the torque switch settings on specific MOVs and to increase monitoring for stem lubrication degradation; (3) the licensee had initiated an action item to re-evaluate the design bases for several MOVs potentially affected by low voltage conditions and to revise the design-basis documents as needed; and (4) the licensee was evaluating performance of an MOV program audit.

Please describe the actions taken to address the specific long-term aspects of the MOV program at FitzPatrick that were noted in the NRC inspection report.

Response 1

- 1-1 JAF has completed an evaluation of the NRC SE of the EPRI MOV program. Based on this review, the Anchor/Darling double disc gate valve required sealing thrust is still being evaluated. We anticipate completion of the evaluation prior to restart from RFO-13. No additional JAF actions are required.
- 1-2 JAF performed further analyses of the calculation methodology. After completion of all corrective actions and final analyses, one valve remained below the administrative 20% minimum target margin. The one valve, 12MOV-69 had a remaining margin of 19.97%, which was evaluated to be a negligible deviation from the administrative limit and therefore acceptable. Stem lubrication frequencies have been adjusted as appropriate. This action is presently being reevaluated in view of Limitorque Technical Update (TU) 98-01. (Please refer to answer to question 3 below.)
- 1-3 The design bases in question have been evaluated and found to be acceptable.
- 1-4 The MOV Program audit was performed with no findings or required actions (QA Audit A98-09J).

New York Power Authority – James A. FitzPatrick
Response to Request for Additional Information Regarding Generic Letter 96-05

Page 2 of 3

Question 2

In a letter dated June 2, 1998, you committed to implement the Joint Owner's Group (JOG) Program on MOV Periodic Verification in response to GL 96-05. The JOG program specifies that the methodology and discrimination criteria for ranking MOVs according to their safety significance are the responsibility of each participating licensee. In a previous letter dated March 17, 1997, you had generally described the risk ranking of MOVs at FitzPatrick for application of the interim MOV static diagnostic test program. As FitzPatrick is a boiling water reactor (BWR) nuclear plant, are you applying the Boiling Water Reactor Owners' Group (BWROG) methodology for ranking MOVs based on their safety significance as described in BWROG Topical Report NEDC-32264 and the NRC SE dated February 27, 1996? If not, please describe the methodology used for risk ranking MOVs at FitzPatrick in more detail.

Response 2

Risk Ranking at JAF has been assigned based on the following:

- MOV risk ranking approach and results presented in the BWROG Topical Report NEDC-32264-A.
- Concerns identified in the NRC SER dated February 27, 1996.
- Risk Achievement Worth (RAW), Risk Reduction Worth (RRW), and Fussel-Veseley importance measures from the updated IPE report, including common cause failure events
- Impact on Level 2 results, external events and shutdown conditions.

These results were presented to the Maintenance Rule Expert Panel for review, and the Expert Panel made the final risk ranking determination.

New York Power Authority – James A. FitzPatrick
Response to Request for Additional Information Regarding Generic Letter 96-05

Page 3 of 3

Question 3

The JOG Program focuses on the potential age-related increase in the thrust or torque required to operate valve under their design-basis conditions. In the NRC SE dated October 30, 1997, on the JOG program, the NRC staff specified that licensees are responsible for addressing the thrust or torque delivered by the MOV motor actuator and its potential degradation.

Please describe your plans for ensuring adequate MOV motor actuator output capability, including consideration of recent guidance in Limitorque Technical Update 98-01 and its Supplement 1 at FitzPatrick.

Response 3

JAF will use a combination of periodic static testing, data trending and preventive maintenance to assure adequate actuator output capability. The testing, data trending, and preventive maintenance are accomplished in accordance with established site procedures and programs. The provisions of Limitorque Technical Update 98-01 and its Supplement 1 are being reviewed for incorporation into the MOV sizing calculations. This effort is planned to be completed prior to restart from RFO-13. The preliminary results from the re-calculation effort have not revealed deficiencies affecting MOV operability. MOV's requiring setpoint changes for long term reliability will be evaluated for action in the upcoming refueling outage or assigned to the appropriate maintenance opportunity.

Attachment 2 to JAFP-98-0338

Summary of Commitments

Number	Commitment	Due Date
JAFP-98-0338-01	Complete establishing stem thrust requirements for NRC Generic Letter (GL) 89-10 for Anchor/Darling Double Disc Gate Valves	Prior to Restart from RFO-13
JAFP-98-0338-02	Complete evaluation of Limitorque Technical Update 98-01 and its Supplement 1	Prior to Restart from RFO-13