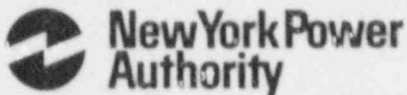


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Radford J. Converse
Resident Manager

May 31, 1988
JAFP 88-0503

United States Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

Attention: Document Control Desk

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
INSPECTION NO. 88-04- INSERVICE TESTING PROGRAM

Dear Sirs:

In accordance with 10CFR2.201, the Authority is submitting its response to Appendix A, Notice of Violation. This Notice was transmitted to the Authority April 29, 1988. The inspection was conducted by Leonard Prividy and John G. Hunter III of Region I office on February 22-26, 1988 at the FitzPatrick Nuclear Power Plant.

NOTICE OF VIOLATION

As a result of the inspection conducted on February 22-26, 1988, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C, the following violations were identified:

- A. Technical Specification 6.8(a) states in part, "Written procedures shall be established and implemented that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures of ANSI (N)18.7-1972....." Paragraph 5.17 of ANSI (N)18.7 requires procedures to assure timely conduct of periodic testing of safety-related components, appropriate documentation, reporting and evaluating test results.
1. Licensee procedure PSO 31 "Inservice Test (IST) Program for Pumps and Valves" in section 7.1.3 states in part, "Figure 8.1 shall be used for category D, C, and non-power operated category B valves....."

Contrary to the above, as of February 26, 1988, Figure 8.1 was not used to record test information for the following valves: 07-TIP-SHEAR-1, 2, 3 and 4 (March 1987); 10-SV-35A (September 1981 and April 1987); 10-SV-40 (December 1982 and July 1983); 10-SV-44 (December 1982 and April 1987); 14-SV-20A (December 1982

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NOTICE OF VIOLATION (cont'd)

and July 1983); 14-SV-20B (April 1987); 11-SLC-39A (February 1986 and April 1987) and 11-EV-14A, B (September 1986 and January 1987).

2. Licensee procedure PSO 31 in section 7.1.4 states, "Figure 8.2 shall be used for Category A and power operated category B valves".

Contrary to the above, as of February 26, 1988, Figure 8.2 was not used for power operated category B valves 26-27-AOV-126 and 26-27-AOV-127.

3. Licensee procedure PSO 31 in section 7.2.2.A.5 states in part, "...Figure 8.6 shall be updated based on the test results within three months of the end of an outage in which leak rate tests were performed."

Contrary to the above, as of February 26, 1988, Figure 8.6 (Category A Leak Rate Data) was not updated, based on the test results, within three months after the end of the 1987 outage.

4. Licensee procedure PSO 31 in section 7.2.2 of the pump portion states in part, "The pump test program shall be documented utilizing Figure 8.3..." Figure 8.3 contains a column to record the lube oil information (e.g. satisfactory reservoir level or oil pressure) as required by the licensee's IST program.

Contrary to the above, on June 21, 1987 and July 24, 1987 for pumps 10-P-3A and 10-P-3C; from October 18, 1984 to January 9, 1988 for pump 11-P-2A; and from February 2, 1985 to April 10, 1987 for pump 11-P-2B, Figure 8.3 was not utilized to record the lube oil information as required by the IST program.

5. Licensee procedure PSO 31 in section 5.2.6 (ISI Engineer Section) states, "will submit changes to surveillance testing procedures to reflect revised valve stroke time or pump acceptance criteria."

Contrary to the above, changes to surveillance test procedure F-ST-4B were not submitted to reflect revised pump acceptance criteria (established after the January 27, 1988 test) prior to the subsequent test that was performed on February 17, 1988.

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NOTICE OF VIOLATION (Cont'd)

6. Licensee procedure PSO 31 in section 7.1.5.i states in part, "... The ISIC will revise the valve limiting stroke times as valve maintenance or modifications indicate..."

Contrary to the above, as of February 26, 1988, the ISIC did not revise the valve limiting stroke time for 14-MOV-5B after maintenance was performed and the normal stroke time for the valve was established by the performance of surveillance test F-ST-3A, on February 15, 1988.

This is a Severity Level V violation. (Supplement I)

- B. 10 CFR 50.55a(g)(4) states in part, "...components which are classified as ASME Code Class 1, 2 and 3 shall meet the requirements...set forth in Section XI of the editions of the ASME Boiler and Pressure Vessel Code and Addenda...". The licensee committed to implement the 1980 Edition through the Winter 1981 Addenda of Section XI.

ASME Section XI, Subsection IWP-3111 states, in part, "... Deviations between the previous and new set of reference values shall be identified and verification that the new values represent acceptable pump operation shall be placed in the record of tests."

Contrary to the above, verification that new reference values represented acceptable pump operation was not placed in the test records in that the disposition for a 106 psi increase in pump differential pressure obtained on May 26, 1987 for HPCI Pump 23-P-1M was not adequately documented in the test records.

This is a Severity Level IV violation. (Supplement I)

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RESPONSE TO NOTICE OF VIOLATION A

The Authority agrees with the findings specified in the violations. These violations resulted from a lack of attention to detail in implementing the In Service Testing (IST) Program per procedure (PSO-31). A comprehensive management review of the IST Program is in process. It includes hiring new personnel and, as an interim measure, retaining an expert consultant for program review and revision. Increased staff involvement will ensure all program requirements are met. The specific implementation problems identified in the subject violation will be corrected no later than November 30, 1988. Additional problems identified in the program and procedure reviews will be addressed in an expeditious manner. To ensure that the IST Program is and will be maintained at the expected quality level a Quality Assurance audit of the entire IST Program implementation is planned. It is anticipated that this Quality Assurance audit will take place within 6 months following the completion of the IST programmatic improvements which are now in progress. Senior plant management will review the results of the Quality Assurance audit and corrective action will be performed to rectify IST program deficiencies.

(50-333/84-04-01)

RESPONSE TO NOTICE OF VIOLATION B

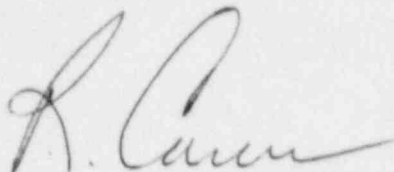
This violation was due to a lack of attention to detail in implementing the IST Program. Immediate corrective action will involve formal documentation to show that the subject reference values represent acceptable pump operation. This evaluation will be included in the IST Program records. This will be completed by July 30, 1988.

As a result of this programmatic deficiency, PSO 31 will be revised to clearly identify the ASME Code requirements for establishing new or additional reference values for IST measured parameters. Also a methodology will be developed to evaluate the impact instrumentation calibration has on IST parameter measurement. Appropriate procedure changes or procedure development will be implemented based on the results of this evaluation. These programmatic improvements will be completed by November 30, 1988.

(50-333/88-04-03)

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RADFORD CONVERSE

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