ATTACHMENT I
TO
JPN-88-027

PROPOSED TECHNICAL SPECIFICATION CHANGES
RELATED TO
CRESCENT AREA VENTILATION
(JPTS-86-010)

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59

3.11 (cont'd)

B. Crescent Area Ventilation

Crescent area ventilation and cooling equipment shall be operable on a continuous basis whenever specification 3.5.A, 3.5.B, and 3.5.C are required to be satisfied.

1. From and after the date that more than one unit cooler serving ECCS components in the same half of the crescent area are made or found to be inoperable, all ECCS components in that half of the crescent area shall be considered to be inoperable for purposes of specification 3.5.A, 3.5.B, and 3.5.C.

2. If 3.11.B.1 cannot be met, the reactor shall be placed in a cold condition within 24 hours.

C. Battery Room Ventilation

Battery room ventilation shall be operable on a continuous basis whenever specification 3.9.E is required to be satisfied.

1. From and after the date that one of the battery room ventilation systems is made or found to be inoperable, its associated battery shall be considered to be inoperable for purposes of specification 3.9.E.

4.11 (cont'd)

B. Crescent Area Ventilation

1. Unit coolers serving ECCS components shall be checked for operability once/3 months.

2. Temperature indicator controllers shall be calibrated once/operating cycle.

C. Battery Room Ventilation

Battery room ventilation equipment shall be checked for operability once/week.

1. When it is determined that one battery room ventilation system is inoperable, the remaining ventilation system shall be checked for operability and daily thereafter.

2. Temperature transmitters and differential pressure switches shall be calibrated once/operating cycle.

ATTACHMENT II
TO
JPN-88-027

SAFETY EVALUATION OF PROPOSED TECHNICAL SPECIFICATIONS RELATED TO CRESCENT AREA VENTILATION

(JPTS-86-010)

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
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Section I DESCRIPTION OF PROPOSED CHANGES

The proposed changes to the FitzPatrick Technical Specifications are limited to Specifications 3.11.B and 4.11.B, on page 239. They are:

[a] In Specification 3.11.B.1, the word "compartment" is revised to read "half of the crescent area".

[b] In Specification 3.11.B.1, the referenced specification sections "3.5.C and 3.5.D", are revised to read "3.5.B and 3.5.C".

[c] In Specification 4.11.B, item 1 is deleted. The remaining first paragraph in that section is numbered "1.":

> "1. Unit coolers serving ECCS components shall be checked for operability once/3 months."

[d] In Specification 4.11.B, item 3 is moved to Specification 3.11.B, and given a new number "2.".

Section II PURPOSE OF THE PROPOSED CHANGES

The purpose of the proposed changes to the FitzPatrick Technical Specification is to clarify and eliminate the conflict in the operability and surveillance testing of the crescent area ventilation system.

The proposed change to Specification 3.11.B.1 (item [a] in Section I above) clarifies the term "compartment". Using the current terminology could be misleading, since it can refer to the entire crescent area.

The proposed change to Specification 3.11.B.1 (item [b] in Section I above) correctly identifies the referenced specifications for equipment located in the crescent area. The current referenced Specification 3.5.D is incorrect, because it refers to the Automatic Depressurization System which is not located in the crescent area.

The proposed change to Specification 4.11.B.1 (item [c] in Section I above) will eliminate the conflict between the present Specifications 3.11.B.1 and 4.11.B.1. The conflict is whether a 7 day or 24 hour Limiting Condition for Operation (LCO) results from the inoperability of more than one unit cooler per side. Specification 4.11.B.1 (7-day LCO) is deleted since it is less conservative than Specification 3.11.B.1 (24 hr LCO).

The proposed change to Specification 4.11.B (item [d] in Section I above) properly identifies Surveillance Requirement 4.11.B.3 as an LCO and assigns it a new number, "Specification 3.11.B.2".

Section III IMPACT OF THE PROPOSED CHANGES

The proposed changes to the Technical Specification, 3.11.B.1 on page 239 (items [a] & [b] in Section I above), do not impact the operation of the plant, since they are administrative in nature and only clarify the terminology used to identify the crescent area and associated equipment properly.

The proposed changes in Specifications 4.11.B on page 239 (items [c] & [d] in Section I above) clarify the LCO. The present Specifications 4.11.B.1 & 4.11.B.3 are shown as Surveillance Requirements, however, they are LCO action statements. Specification 4.11.B.1 contains a 7 day LCO resulting from the inoperability of more than one unit cooler in the same half of the crescent area. This Specification is being deleted, because it is in conflict with and non-conservative with respect to Specification 3.11.B.1 which requires that the reactor be placed in the cold condition within 24 hours under the same conditions. Specification 4.11.B.3 is being moved from the Surveillance Requirement column to the LCO column with a new Specification number "3.11.B.2". These proposed changes do not impact the operation of the plant, since they only clarify and eliminate the conflict in the LCO for the crescent area ventilation system.

These proposed changes do not change any system or subsystem and will not alter the conclusions of either the FSAR or SER accident analysis.

Section IV EVALUATION OF SIGNIFICANT HAZARDOUS CONSIDERATIONS

The proposed changes to the FitzPatrick Technical Specifications do not involve hardware or procedural changes to the plant. Operation of the FitzPatrick plant in accordance with the proposed amendment would not involve significant hazards considerations as defined in 10 CFR 50.92, since it would not:

(1) involve a significant increase in the probability or consequences of an accident previously evaluated because the change results in clarifying the operability of the crescent area ventilation system. Also, the proposed change will eliminate Specification 4.11.B.1 which is

in conflict with and non-conservative with respect to Specification 3.11.B.1.

(2) create the possibility of a new or different kind of accident previously evaluated. As stated above, the proposed amendment does not involve physical changes to the facility. These proposed changes will facilitate the understanding of the crescent area ventilation operations and not create a new or different kind of accident. Also, the proposed change will eliminate the conflict between Specifications 3.11.B.1 and 4.11.B.1 by the selection of the more conservative LCO.

(3) involve a significant reduction in the margin of safety. The proposed amennt area ventilation system and eliminate the conflict that existed prior to the change. This will help the operator in better understanding of these Specifications.

Section V IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of these changes, as proposed, will not impact the ALARA or Fire Protection Programs at FitzPatrick, nor will the changes impact the environment.

Section VI CONCLUSION

The change as proposed does not constitute an unreviewed safety question as defined in 10 CFR 50.59, that is, it:

a. will not change the probability or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;

b. will not increase the possibility of an accident or malfunction of a different type than any previously evaluated in the Safety Analysis Report;

c. will not reduce the margin of safety as defined in the basis for any technical specification;

d. does not constitute an unreviewed safety question; and

e. involves no significant hazards consideration, as defined in 10 CFR 50.92.

Section VII REFERENCES

1. James A FitzPatrick Nuclear Power Plant Final Safety Analysis Report (FSAR).

2. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER).

3. NYPA letter, J.P. Bayne to D.B. Vassallo, dated May 3, 1984 regarding "Additional Information Concerning Crescent Area Ventilation Surveillance Test".