

James Knubel
Senior Vice President and
Chief Nuclear Officer

February 6, 1998
JPN-98-005

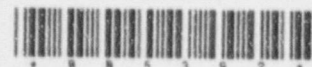
United States Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, DC 20555

Subject: **James A. FitzPatrick Nuclear Power Plant**
Docket No. 50-333
Revision to Proposed Technical Specification Change (JPTS-95-004,
Inservice Leak and Hydrostatic Testing Operation)

- References:
1. NYPA Letter, W. J. Cahill, Jr. to USNRC, "Proposed Changes to the Technical Specifications Regarding Inservice Leak and Hydrostatic Testing Operation (JPTS-95-004)", JPN-96-005 dated February 1, 1996
 2. LER-95-007, Enforcement Discretion Required for Control Room Ventilation Operability Requirements, dated April 20, 1995, from H. P. Salmon, Jr.
 3. NYPA Letter, M. J. Colomb to USNRC, "Additional Information Regarding Proposed Change to the Technical Specifications Regarding Inservice Leak and Hydrostatic Testing Operation (JPTS-95-004)", JAFP-96-0379 dated September 26, 1996

Dear Sir:

This application for an amendment to the James A. FitzPatrick Technical Specifications (TS) supersedes and replaces the amendment application transmitted by Reference 1. The application for an amendment proposes to allow reactor coolant system pressure tests to be performed while remaining in the Cold Shutdown Mode. Primary containment integrity is not required in the Cold Shutdown Mode thus allowing unrestricted access to the primary containment for the performance of inspections. The changes will also allow some outage activities on other systems to continue at the same time as during pressure testing. The changes are consistent with Special Operations Section 3.10.1, "Inservice Leak and Hydrostatic Testing Operation," from Standard Technical Specifications (STS), NUREG-1433, Revision 1. Minor exceptions are required to ensure consistency within FitzPatrick TS, reflect differences between FitzPatrick TS and STS, and ensure the same level of ECCS redundancy afforded by STS during pressure testing. These exceptions will be eliminated when the FitzPatrick TS are converted to Improved Technical Specifications based on NUREG-1433, Revision 1. Editorial changes to improve the table of contents, relocate text, use consistent terminology, and reflect the addition of new TS pages are also proposed.



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This revision also addresses instrumentation required for initiation of Reactor Building (secondary containment) isolation, automatic initiation of the Standby Gas Treatment System, and additional details regarding secondary containment isolation valves. Revised Technical Specification pages (in Attachment I) have been changed to explicitly state which instrumentation is required by proposed limiting condition for operation (LCO) 3.12.A, "Inservice Leak and Hydrostatic Testing Operation", and an explicit reference to the definition of secondary containment integrity has been added. Discussion of the changes and a comparison to STS LCO 3.10.1 requirements are included in Attachment II.

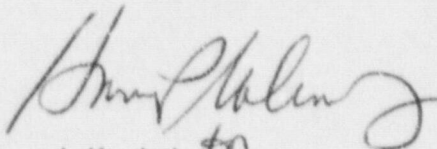
The signed original of the Application for Amendment to the Operating License is enclosed for filing. Attachment I contains the proposed new Technical Specification pages, and Attachment II is the Safety Evaluation for the proposed changes. Changes to the text in Attachment II to reflect the request for additional information is indicated by a vertical bar in the margin. A markup of the affected Technical Specification pages is included as Attachment III.

There are no commitments contained in this submittal.

A copy of this application and the associated attachments are being provided to the designated New York State official in accordance with 10 CFR 50.91.

If you have any questions, please contact Mr. A. Zarembo at (315) 349-6365.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. Knubel", with a stylized flourish at the end.

J. Knubel
Senior Vice President and
Chief Nuclear Officer

cc: Next page

cc: Regional Administrator
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