ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING INTAKE DEICING HEATERS SURVEILLANCE FREQUENCY

(JPTS-89-007)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

3.11 (cont'd)

E. Intake Deicing Heaters

Intake heaters are required to be operable when intake water temperature is less than or equal to 37°F. A minimum of 18 out of 88 heaters are required to be operable to maintain the required flow for the ESW and RHRSW Systems.

1. If Specification 3.11.E above cannot be met the reactor shall be placed in a cold condition within 24 hours.

4.11 (cont'd)

E. Intake Deicing Heaters

1. The six heater feeder ammeters shall be checked weekly whenever the intake water temperature is less than or equal to 37°F.

2. The individual heaters shall be monitored once/6 months for rated heater current or as required by large deviations in the feeder checks in 3.11.E.1 above.

3. Resistance to ground shall be checked once/year.

ATTACHMENT II

SAFETY EVALUATION FOR PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING INTAKE DEICING HEATERS SURVEILLANCE FREQUENCY

(JPTS-89-007)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
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I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications revise Specifications 3.11.E and 4.11.E, "Intake Deicing Heaters," on page 242.

1. In Specifications 3.11.E and 4.11.E.1, replace "≤" with the words "less than or equal to."

2. In Specification 3.11.E.1, replace the phrase "3.11.E.1" with "3.11.E above."

3. In Specification 4.11.E.3, replace the phrase, "once/operating cycle," with the word, "once/year."

II. PURPOSE OF THE PROPOSED CHANGES

These changes increase the minimum frequency of the resistance to ground surveillance test requirement for the intake deicing heaters to be consistent with the frequency specified in Basis 3.11 and with present plant practices. The resistance to ground surveillance test is performed on an annual basis during the warm weather season when the intake deicing heaters are not energized.

In addition, Specifications 3.11.E and 4.11.E are revised to improve the readability of the Technical Specifications. These changes are considered to be purely administrative in nature.

III. IMPACT OF THE PROPOSED CHANGES

These changes are purely administrative in nature and are consistent with present plant practices. The changes do not involve the modification of any existing equipment, systems, or components; nor do they relax any administrative controls or limitations imposed on existing plant equipment. The changes do not alter the conclusions of the plant's accident analyses as documented in the FSAR or the NRC staff's SER.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the James A. FitzPatrick Nuclear Power Plant in accordance with the proposed amendment would not involve a significant hazards consideration 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. The changes to Specifications 3.11.E and 4.11.E are purely administrative in nature and improve the consistency of

the Technical Specifications. These changes increase the frequency of the resistance to ground surveillance requirement for the intake deicing heaters from once per operating cycle to once per year to be consistent with Basis 3.11 and with present plant practices. The editorial changes improve the readability of the Technical Specifications. The increased test frequency can not increase the probability or consequence of a proposed accident previously evaluated.

2. create the possibility of a new or different kind of accident from those previously evaluated. The proposed changes are purely administrative in nature. They do not create any new failure modes; nor do they place the plant in an unanalyzed condition.

3. involve a significant reduction in the margin of safety. The proposed changes improve the consistency of the Technical Specifications and reflect actual plant practice. These changes do not involve a significant reduction in the margin of safety.

In the April 6, 1983 Federal Register (48FR14870), NRC published examples of license amendments that are not likely to involve a significant hazards consideration. Examples (i) and (ii) from this Federal Register are applicable to these changes and state:

> "(i) A purely administrative change to a technical specification: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.
>
> (ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications: for example, a more stringent surveillance requirement."

The proposed changes can be classified as not likely to involve significant hazards considerations, since the changes either impose a more stringent surveillance requirement or can be considered purely administrative in nature.

V. IMPLEMENTATION OF THE PROPOSED CHANGES

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

VI. CONCLUSION

The changes, as proposed, do not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, they:

a. will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report;

b. will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report;

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

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

VII. REFERENCES

1. James A. FitzPatrick Nuclear Power Plant Updated Final Safety Analysis Report, Section 9.7.

2. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report, dated November 20, 1972 and Supplements.