

November 14, 2003

Mr. Michael Kansler
President
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT - REQUEST FOR
ADDITIONAL INFORMATION CONCERNING RELIEF REQUEST VRR-08
(TAC NO. MC0184)

Dear Mr. Kansler:

The Nuclear Regulatory Commission (NRC) staff has reviewed your submittal dated July 8, 2003, concerning the subject proposed relief request VRR-08 to the James A. FitzPatrick Inservice Testing Program. The NRC staff has determined that it needs additional information to continue its review. The enclosed request for additional information identifies the information needed to continue the review. The staff discussed the issue with your staff on October 23, 2003, and your staff indicated that you could respond within 60 days from receipt of this letter.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc w/encl: See next page

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DISTRIBUTION:

PUBLIC	PD1-1 R/F	R. Laufer	S. Little
G. Vissing	OGC	ACRS	J. Jolicoeur

ACCESSION NUMBER: ML033010220 *See previous concurrence

OFFICE	PDI-1/PM	PDI-1/LA	EMEB	PDI-1/SC
NAME	GVissing	SLittle*	GBedi for DTerao	PTam for RLaufer
DATE	11/13/03	11/13/03	11/13/03	11/13/03

OFFICIAL RECORD COPY

FitzPatrick Nuclear Power Plant

cc:

Mr. Gary Taylor
Chief Executive Officer
Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213

Mr. John Herron
Sr. VP and Chief Operating Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Theodore H. Sullivan
Vice President, Operations
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Mr. Brian O'Grady
General Manager, Plant Operations
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 100
Lycoming, NY 13093

Mr. Dan Pace
Vice President, Engineering
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Randall Edington
Vice President, Operations Support
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. John Kelly
Director, Nuclear Safety Assurance
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093

Ms. Charlene D. Faison
Manager, Licensing
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Director of Oversight
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. William Maquire
Director, Nuclear Safety Assurance
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Mr. Andrew Halliday
Manager, Regulatory Compliance
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Supervisor
Town of Scriba
Route 8, Box 382
Oswego, NY 13126

Mr. Charles Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

FitzPatrick Nuclear Power Plant

cc:

Oswego County Administrator
Mr. Steven Lyman
46 East Bridge Street
Oswego, NY 13126

Mr. Peter R. Smith, Acting President
New York State Energy, Research,
and Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. Paul Eddy
New York State Dept. of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

Mr. John M. Fulton
Assistant General Counsel
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Ken L. Graesser
BWR SRC Consultant
38832 N. Ashley Drive
Lake Villa, IL 60046

Mr. Jim Sniezek
BWR SRC Consultant
14601 Layhill Road
Silver Spring, MD 20906

Mr. Ron Toole
BWR SRC Consultant
605 West Horner Street
Ebensburg, PA 15931

Ms. Stacey Lousteau
Treasury Department
Entergy Services, Inc.
639 Loyola Avenue
Mail Stop L-ENT-15E
New Orleans, LA 70113

REQUEST FOR ADDITIONAL INFORMATION (RAI)

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

RELIEF REQUEST VRR-08

HIGH-PRESSURE COOLANT INJECTION (HPCI) AND

REACTOR BUILDING CLOSED LOOP COOLING (RBCLC) SYSTEMS CHECK VALVES

Reference: Entergy Nuclear Operations, Inc., James A FitzPatrick Nuclear Power Plant (Fitzpatrick), "Submittal of Relief Request VRR-08 for Third 10-year Interval Inservice Testing Program."

The Nuclear Regulatory Commission (NRC) staff requests the following additional information to complete its review.

RAI 1: The licensee has referenced a recently-approved Valve Relief Request for Entergy's River Bend Station Unit 1. See ADAMS Accession Number (ML030300276) as a comparable submittal to the one submitted by the licensee for FitzPatrick in VRR-08. It should be noted that the River Bend Station submittal contained significantly more information than that provided in VRR-08. Please provide complete details (including your reasoning for each valve) in Relief Request VRR-08, as was provided in the Basis for Relief sections of River Bend's relief requests. Please see the River Bend Station's submittal to supplement the information in VRR-08. In addition, please include all the appropriate responses of the following RAIs in the relief request, as necessary.

RAI 2: Provide the American Society of Mechanical Engineers Class and size of the reactor building closed-loop cooling (RBCLC) valve 15RBC-214.

RAI 3: Provide all the related piping and instrumentation drawings which contains the relief request's check valves in the HPCI and RBCLC systems.

RAI 4: Relief Request VRR-08 does not address the safety and risk significance of on-line inservice testing (IST) of the check valves. Please address (either in a qualitative or quantitative manner) the potential risk of disassembly and inspection of this check valve on-line compared to while the plant is shutdown for all check valves greater than 2 inches nominal pipe diameter including the HPCI and RBCLC check valves.

RAI 5: Provide sufficient information for NRC staff to reach a safety or risk determination with regards to the leak testing experience and leak tightness reliability of the associated valves and the potential consequences of a loss of isolation capability during disassembly, inspection, and manual exercising of the larger size valves.

RAI 6: Based on the risk significance discussed in RAI 4 above, discuss what preventive or compensatory measures are necessary to maintain safety and minimize risk while performing on-line IST.

RAI 7: Under the section entitled Basis for Relief, the licensee states that the maintenance rule 10 CFR 50.65(a)(4) requires licensees to assess and manage the increase of risk that may

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result from proposed maintenance activities. However, in order for the staff to evaluate whether the proposed IST alternative is acceptable, the licensee must demonstrate that the alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i). Performing a risk assessment of the proposed on-line testing at the time of IST does not address why on-line testing provides an acceptable level of quality and safety at this time. Meeting the maintenance rule is a separate regulatory requirement. Nonetheless, discuss how risk insights, as well as other factors, will be used to establish when IST should be performed either on-line or during refueling outages.

RAI 8: Explain how Technical Specification requirements for the HPCI system and/or RBCLC system will be satisfied while performing on-line IST of these check valves in their respective systems. Specifically, address the limiting condition for operation and describe the actions the licensee will take to ensure that on-line IST will be accomplished within the allowed outage time. Discuss the typical amount of time needed to complete the IST of this check valve, based on previous testing experience. Similarly, describe any contingency plans that will be in effect to provide reasonable confidence that the allowed outage time will not be exceeded if the check valve is found to be in a significantly degraded or unacceptable condition.

RAI 9: For several check valves in the HPCI system for which you are requesting relief, you have provided the associated refueling outage justifications for allowing these check valves to be tested during refueling outages. For each of these check valves, the licensee should discuss why it is now practical to test these valves on-line when the refueling outage justifications appear to justify that testing on-line on a quarterly basis was impractical.