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November 29, 1979

JPN-79-74

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TELECOPIED TO:

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Urgent Request for Spent Fuel Rack
Installation Approval

Dear Mr. Eisenhut:

This is in reference to a telephone conversation on November 5, 1979 between your Mr. T. Ippolito and our Messrs. P. Early and J. Helland regarding the Authority's submittal to the Nuclear Regulatory Commission requesting approval to install increased capacity fuel racks in the FitzPatrick spent fuel pool.

In this telephone conversation, Mr. Ippolito indicated that Nuclear Regulatory Commission approval to install the increased capacity fuel racks would not be forthcoming since the work in the NRC to complete certain reports regarding the racks had been assigned low priority. Mr. Ippolito further stated that it is not necessary that these racks be installed in the FitzPatrick spent fuel pool before the next refueling outage since it is not necessary to remove the entire core from the vessel for work on the Torus or LPRM's. We received this message from Mr. Ippolito after having received repeated assurances from your Mr. P. Polk during the past six months that NRC approval was imminent.

The purpose of this letter is to confirm our need for your immediate approval of this request and to request your assistance in securing this approval. The basis for this need is both safety related and economic, and these are discussed separately below.

I. Safety Considerations

1. Prompt installation of the racks as scheduled will provide, as early as possible, the capability of a full core unload at the JAFNPP. This capability does not exist at the present time.

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2. Extensive work has been planned for the outage to conduct inservice inspection of various stainless steel piping configurations (Core Spray piping, CRD hydraulic return nozzle and piping, Core Spray safe ends, recirc. safe ends, recirc. piping (risers), recirc. by-pass lines) which on other plants have experienced stress corrosion and thermal cycle cracking. In particular, the recirculation pipe safe ends cannot be repaired or replaced without removing the entire core from the reactor vessel. This is to ensure safe coolant coverage of the fuel during the performance of this work.

If this inspection should indicate that repairs or replacements are necessary to the reactor coolant pressure boundary, the core may have to be off loaded. In addition, the radiological doses associated with the work will be reduced by having the core removed from the reactor vessel, thus complying with ALARA requirements.

II. Economic Considerations

The inability to off load the entire core during the forthcoming refueling outage can cost the Authority and the people of New York State considerable expense resulting from increased outage time.

In addition to the piping work described under Item 2 of "Safety Considerations", a considerable amount of work is planned for the Torus during the coming outage as a result of the Mark I Containment Program, which will require that the Torus be drained. Since the FitzPatrick Technical Specifications do not permit work, which has the potential for draining the vessel, when no emergency core cooling systems are available, the piping work could not be done while the Torus is drained and the fuel is in the vessel. This means that, with the core in the vessel, any required piping work would have to be done in series with the Torus work thereby extending the duration of the outage by an amount dependent upon the piping work required to be done. This outage extension could range from several days to several weeks, resulting in loss to the Authority in the millions of dollars.

The Nuclear Regulatory Commission has had the Authority's submittal requesting approval to install the increased capacity fuel racks since November, 1978. We believe that this should be adequate for the Nuclear Regulatory Commission to respond, especially since the FitzPatrick racks are of a design which has been accepted by the Commission for several other utilities.

We believe that the work scheduled for this outage should not be deferred for another refueling outage, nor should the people of the State of New York be penalized with the loss of economical electrical generation for a prolonged period because the Commission will not act on the Authority's request.

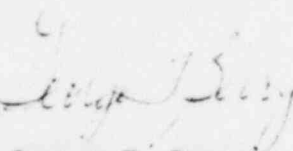
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Mr. Darrell G. Eisenhut
NRC

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In view of the impact of denying this submittal on plant availability and on plant safety, we reiterate that we request your prompt approval.

Very truly yours,



George T. Berry
President and Chief
Operating Officer

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