

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



JOHN D. LEONARD, JR.
Resident Manager

May 23, 1979
JAFP-79-257

P.O. BOX 41
Lycoming, New York 13093

315-342-3840

Mr. Boyce H. Grier, Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Docket No. 50-333 IE Inspection No. 79-02

Dear Mr. Grier:

With reference to the inspection conducted by Mr. R. Conte of your office on March 13 through 16, 1979 at the James A. FitzPatrick Nuclear Power Plant and in accordance with the provisions of Section 2.201 of Part II of Title 10 of the Code of Federal Regulations, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated May 4, 1979 as received by the undersigned on May 10, 1979.

APPENDIX A

NOTICE OF VIOLATION

- A. Technical Specifications (TS) 6.8(A) states in part: "Written procedures and administrative policies shall be...implemented ..." and TS 6.8(C) states in part: "Temporary changes to nuclear safety related procedures may be made provided...The change is documented, reviewed by the PORC (Plant Operations Review Committee) and approved by the Resident Manager within 14 days of implementation."

Administrative Procedure (AP)-1.4, Control of Plant Procedures, Revision 2, February 16, 1978, paragraph 7.4.1 requires that temporary changes be documented on a "Procedure Initiation/Revision Request Form" for proper review and approval. Also, Operation's Department Standing Order No. 5, Valve (Electrical) Lineup Check-Off Lists Review, Revision 0, July 7, 1978, paragraphs 7.1 and 7.2 require that the reasons for valve positions that are different from normal operating conditions be documented on a form (Form 8.1) which is to be a cover sheet for the completed valve line-up.

Contrary to the above as of March 16, 1979, temporary changes to various valve line-ups were not documented on Procedure Initiation/Revision Request Forms and, therefore, not properly reviewed and approved; also, the reasons for various valve positions that are

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different from normal operating conditions were not documented on the required valve line-up cover sheets. These conditions were observed for valve line-ups completed to support plant startup following the 1978 Refueling Outage and were noted in the following specific valve line-ups: OP-1, Main Steam System; OP-2A, Feedwater System; OP-13, Residual Heat Removal System; OP-14, Core Spray System; OP-15, High Pressure Coolant Injection System; OP-20, Standby Gas Treatment System; and OP-27, Recirculation System.

RESPONSE TO ITEM A:

The findings of the Inspector as set forth above are correct. It should be noted however, that in no case were the valve line-up sheets misleading or different from the actual physical configuration of the valves in the plant. The error made was that the prescribed paper work had not been properly filled out. The operating staff at all times, because of the changes made on the valve line-up sheet, knew the actual configuration of the plant systems noted. As a specific example, a temporary change should have been issued to delete two valves which had been removed because of a physical modification in the plant. The valves had been lined out on the valve line-up sheet by the operator making the system line-up and this had been brought to the attention of the Shift Supervisor. Since the line-up sheet is an appendage to the system operating procedure, the temporary change control system should have been implemented to make this change to the sheet.

In other cases where valve positions on the valve line-up sheet were noted as different from the specified line-up condition, this was because the system was in a startup condition and not in a normal operation at power condition. Those cases where the valves were noted as being in a different than normal operation position should have been called out on the cover sheet as prescribed in our Operations Department Standing Order No. 5, which had been recently written to cover this contingency.

We will place this Infraction reply in our reading file for the operators to emphasize the importance of utilizing the correct administrative control measures to further ensure that valve line-ups are properly made.

In addition to the valve line-up sheets which are required prior to start up of this plant, the Operations Department conducts surveillance tests prior to startup on required reactor safety systems. This further assures their proper operability.

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It is reiterated that in these cases noted by the Inspector, the valve line-up sheets did properly represent the actual plant configuration. This plant configuration was known to the operating staff and the violation was one of failure to implement the administrative controls established in the plant rather than

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failure to properly prepare the physical plant for operation. We will also insure the use of these controls is emphasized during future training.

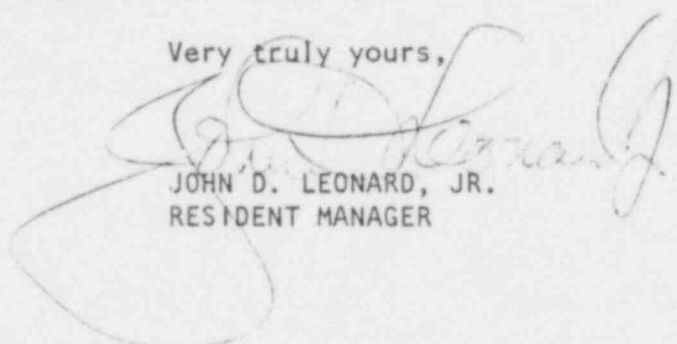
- B. Technical Specifications 4.7.A.1 states in part: "...whenever there is...testing which adds heat to the suppression pool, the pool temperature shall be continually monitored and also observed and logged every 5 minutes until heat addition is terminated..."

Contrary to the above, on three instances between September 23, 1977 and December 8, 1978, suppression pool temperature was not continually monitored, and was not observed and logged every 5 minutes during testing which added heat to the suppression pool in accordance with Surveillance Test, ST 22B, Automatic Depressurization System (ADS) Manual Relief Valve Operation (current revision in effect at the time of testing).

RESPONSE TO ITEM B

The FitzPatrick Plant Staff acknowledges that the suppression pool temperatures have not been logged every 5 minutes during the testing of automatic pressurization valves as described in Operations Surveillance Test F-ST-22B in the past. This oversight has been corrected by revising the referenced Surveillance Test.

Very truly yours,


JOHN D. LEONARD, JR.
RESIDENT MANAGER

JDL:VC:brp

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