

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



JOHN D. LEONARD, JR.
Resident Manager

P.O. BOX 41
Lycoming, New York 13093

315-342-3840

January 5, 1979
JAFP-79-011

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. 78-25

Dear Mr. Grier:

With reference to the inspection conducted by Mr. A. Finkel of your office on November 15 and 16, 1978 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 reply to Appendix A of the Notice of Violation transmitted by your letter dated December 8, 1978 and received by the undersigned on December 11, 1978.

APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on November 15-16, 1978, it appears that one of your activities was not conducted in full compliance with NRC regulations and conditions of your License No. DPR-59 as indicated below.

10CFR 50, Appendix B, Criterion V states, in part, "...Activities affecting quality shall be prescribed by documented instructions, procedures, or drawing of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions..."

James A. FitzPatrick FSAR Section 8.5.3.4 states, in part, "...The emergency service portion of the Plant Service A-C Power Distribution System is designed in accordance with the IEEE Criteria for Class IE Electrical Systems for Nuclear Power Generating Station No. 308..." This is implemented by Installation of Electrical Equipment Procedure CMP No. 9.2-4.76, Section 5.0, paragraph 5.3, which states

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that"...After installation, tie cables to tray rings at the intervals specified below, with additional ties in fittings where necessary to maintain fixed positions..." Paragraph 5.8 states, in part, "...Arrange control and instrument cables neatly...on horizontal trays, tie bundles, or individual cables to tray rungs or to other bundles..."

Contrary to the above, during this inspection on November 15, 1978, cables were found to be coiled on top of safety related cables in trays in the cable spreading room and the relay room. It was determined that the licensee apparently did not install cables in safety related trays as required by the "Installation of Electrical Equipment Procedure CMP No. 9.2-4.76."

RESPONSE TO VIOLATION

With regard to the Infraction listed in Inspection Report 50-333/78-25, the Inspector based his findings upon cable routing described in the plant's cable and raceway schedules. The Plant Staff Members he contacted at that time were unaware that this cable and raceway schedule is not the official document which describes the proper routing and termination of cables. The official documents are "Cable Pull Tickets."

Examination of these installation documents (Pull Tickets) shows that the cable was originally scheduled to go to Auxiliary Relay Cabinet NEUT7 but issue No. 2 of the cable pull ticket (dated 12/3/74) designates that the cable should be coiled in the tray as presently exists. The cable is designated as spare.

Cable ICINNNX194 is a similar situation. This cable was originally scheduled to go to Analog Input Cabinet 14 and Issue No. 4 of the Cable Pull Ticket (issued 2/20/74) designates that the cable should be coiled in the tray as presently exists. This cable was installed on 12/28/72 and is designated as spare. We do agree that the cable end should be covered (taped) and this matter will be attended to.

During the construction period, numerous cables were installed and designated as spares since they were not required. The decision was made by the Engineers to coil the cable, leave them in the trays and designate them as spares for future use if needed. This accounts for the other cables mentioned but not specifically designated in the report.

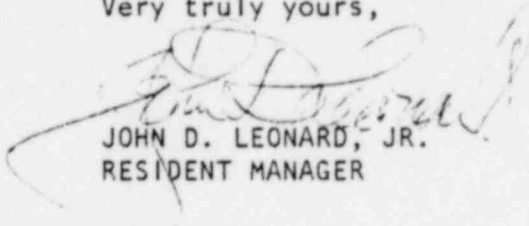
With regard to the procedure CMP 9.2-4.76, this was issued in April, 1976 as part of the revised Stone & Webster Quality Assurance Program and was not in effect at the time of the cable installation. The cable was installed in accordance with the Stone & Webster Project Electrical Criteria in effect at that time.

Boyce H. Grier, Director
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In view of the above, the James A. FitzPatrick Staff does not feel that any violation actually occurred and we respectfully request that your staff review the status of this item.

Very truly yours,



JOHN D. LEONARD, JR.
RESIDENT MANAGER

JDL:VC:brp

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