

POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE NEW YORK, N. Y. 10019

(212) 397-6200

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November 2, 1979
JPN-79-71

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Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch No. 3
Division of Operating Reactors

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Pipe Stress Reevaluation Program

Reference: NRC Letter dated August 14, 1979, Docket No. 50-333,
Edson G. Case to George T. Berry

Dear Sir:

The referenced letter issued an Order lifting the suspension of facility operation required by the Order to Show Cause dated March 13, 1979, for the James A. FitzPatrick Nuclear Power Plant.

The Order which lifted suspension of facility operation specified certain commitments made by the Authority to the NRC. This letter restates these commitments below, and indicates that the Authority has now fully met each of these commitments.

1. That all modifications to correct all piping systems, equipment nozzles and containment penetrations and all modifications to supports located in areas inaccessible during normal plant operation shall be completed prior to plant start-up.

This commitment was met, as reported to you in our letters of August 2, 1979, August 10, 1979, and August 14, 1979. Our letter of September 5, 1979 advised you that ascent in power commenced on September 3, 1979.

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2. That the Authority shall both complete reanalyses of the remaining pipe supports in areas accessible during normal plant operation and propose a schedule for implementation of any necessary modification within sixty (60) days of plant start-up.

This letter notifies you that reanalysis of the remaining pipe supports in areas accessible during normal plant operation is now complete. There are 37 of these supports which require modification, but which have been determined to be operable; i.e., support loads are less than a factor of safety of two to ultimate and/or are within the limits of ASME B&PV Code, Section III, Subsection NF. All of these supports are scheduled to be modified prior to a return to power following the 1980 scheduled refueling outage. Since these supports have been determined operable, there is no undue risk to public health and safety from continued operation of the FitzPatrick Plant in the interim.

3. For each modification identified as a result of reanalysis of the remaining supports in accessible areas after resumption of facility operation, when a support is deemed inoperable the NRC shall be notified within 24 hours after making each such determination. The affected system shall be considered inoperable until the necessary modifications are implemented within seven days or the time frame allowed by the facility Technical Specifications, whichever is less, unless a reanalysis of the affected piping system is performed which:
(1) demonstrates that the overstressed support remains operable, or (2) demonstrates, with the overstressed support removed from the system, that the system remains operable.

Completion of reanalysis of the remaining supports in accessible areas indicated 23 supports to be inoperable. In each case, the Authority's site personnel transmitted an LER to the NRC within 24 hours of such a determination. In each case, the necessary modifications were implemented within seven days or the time frame allowed by the FitzPatrick Plant Technical Specifications; or analysis was executed demonstrating that the system remained operable with the overstressed support removed.

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4. The FitzPatrick Plant shall be shut down if an earthquake with an acceleration greater than .01 occurs (site accelerometers are set at 0.01 g) and the licensee shall inspect all safety-related piping systems which have not been reanalyzed and shown to be acceptable at the 0.07 g level of the OBE. Prior to resuming operations following an earthquake, the licensee shall demonstrate to the Commission that no functional damage has occurred to those features necessary for continued operation without undue risk to the health and safety of the public.

The Order which lifted facility suspension stated that the above commitment is required only until such time that the reanalysis for the OBE loading condition, and any necessary modifications, are completed. The reanalysis executed in response to the Order to Show Cause considered both the DBE and OBE loading conditions for all piping, equipment nozzles and containment penetrations. In regard to pipe supports, the DBE loading condition was applied in all cases, and the OBE loading condition was applied in all but a few isolated cases. For these isolated cases, review of the OBE loading condition is expected to be completed by November 15, 1979. At that time you will be informed accordingly, and the Authority considers it will be released from its commitment to shut down and inspect safety-related piping systems in the event of an earthquake with an acceleration greater than .01 g.


As noted in our July 9, 1979 letter to the NRC Region I Director, the Authority considers that the criteria of I&E Bulletin 79-14 was fully met for both the inaccessible and accessible piping systems within the scope of reanalysis required by the March 13, 1979 Order to Show Cause. The procedure for conducting field verifications was reported to you in our August 2, 1979 letter. Also, wherever pipe support modifications were necessary, the baseplate and anchor bolts were designed to be in conformance with the criteria of I&E Bulletin 79-02 (if a concrete anchor bolt design was used).

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Completed analytical piping packages are presently being compiled and are available for your inspection, as are any field modifications to supports which resulted from the reanalysis effort.

In summation, of the 989 pipe supports which originally existed and which required review under the Order to Show Cause, only 37 supports, all determined to be operable, still require modification. The failure of any of these supports will not render its associated system inoperable. All other 952 supports have either been reviewed and found to meet present standards, or were modified. Therefore, continued operation of the FitzPatrick Plant provides no undue risk to the public health and safety.

Very truly yours,


Paul J. Early
Assistant Chief Engineer-
Projects

cc: Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

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