

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



RAYMOND J. PASTERNAK
Resident Manager

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April 9, 1981
SERIAL: JAFP 81-0343

Eldon J. Brunner, Chief
Projects Branch #1
Division of Resident & Project Inspection
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

SUBJECT: DOCKET NO. 50-333 I&E INSPECTION NO. 81-02

Dear Mr. Brunner:

With reference to the inspection conducted by Mr. J. Linville, Jr. of your office on January 1-31, 1981 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 March 18, 1981 as received by the undersigned on March 23, 1981.

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted during the period January 1 through January 31, 1981 and in accordance with the Interim Enforcement Policy, 45 FR66754, (October 7, 1980), the following violation was identified:

Technical Specification 6.8 states in part, "Written procedures and administrative policies shall be established, implemented and maintained...".

Operations Department Standing Order No. 2, Operating Principles and Philosophy, Revision 1, dated November 30, 1979, step 6.1.1 states, Procedure Compliance is Mandatory.

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Contrary to the above, an auxiliary operator who was not aware of the existence of a procedure for topping off a partially filled nitrogen storage tank which is contained in paragraph D.3 of Operating Procedure No. 37, Nitrogen Ventilation and Purge, Containment Atmosphere Dilution (CAD), Containment Vacuum Relief and Containment Differential Pressure System, Revision 4, dated October 28, 1980, was sent to perform this evolution. Because he could not locate the tank vent valve he did not reduce pressure in the tank prior to filling as required by step D.3.b and the tank pressure rose to the relief valve setpoint. In addition, he failed to isolate the pressure building coil as required by step D.3.a.

Operations Department Standing Order No. 1, Operating Staff Responsibilities and Authorities, Revision 3, dated December 21, 1979, step 5.1.9 states in part, "When accident or potential accident conditions are encountered the shift supervisor shall immediately return to the control room and direct operator activities. He shall remain there until the plant is stable or he is relieved and such relief is recorded in the plant log ...".

Contrary to the above, at approximately 8:40 AM on January 17, 1981, upon entering the control room and realizing that the plant had scrambled from approximately full power due to a loss of the uninterruptible power supply bus, the shift supervisor stated that he went to the 300 foot elevation of the reactor building to check reactor vessel level.

Work Activity Control Procedure No. 10.1.2, Equipment and Personnel Protective Tagging, Revision 3, dated December 18, 1980, step 7.1.2.1 states in part, "Additional protection may be added to the original Clearance at any time after issue with permission of the TAG HOLDER and concurrence of the CONTROLLER."

Contrary to the above, the TAG HOLDER of Protection Tagout Record (PTR) No. 810029 repositioned the auxiliary power supply device for the uninterruptible power supply bus to provide additional protection for himself without the concurrence of the CONTROLLER on January 17, 1981. This action resulted in a plant trip from full power.

This is a Severity Level IV Violation (Supplement 1)

RESPONSE TO VIOLATION

The FitzPatrick Plant has reviewed the subject inspection and the circumstances associated with each of the three examples of noncompliance which are listed. The response to each of the examples is provided below.

EXAMPLE NO. 1

When the Shift Supervisor was informed that the auxiliary operator topping off the partially filled nitrogen storage tank was either not aware of the approved procedure or was not following the approved procedure, an additional operator knowledgeable of the procedure and the task of topping off nitrogen storage tanks was assigned to the task. This action brought the FitzPatrick Plant into full compliance with respect to this example.

To prevent recurrence, discussions have been held with the Shift Supervisors to stress the importance of assigning personnel to tasks only when they are aware of and familiar with the written and approved procedures to be utilized in the performance of assigned tasks.

EXAMPLE NO. 2

The FitzPatrick Plant does not concur with the Inspector's judgment that the Shift Supervisor's actions during and immediately following the transient initiated by the loss of the Uninterruptible Power Supply (UPS) on January 17, 1981, constitutes an example of failure to adhere to written, approved procedures and administrative policies as described in the Technical Specifications, Operations Department Standing Order No. 1 or Operations Department Standing Order No. 2.

The Shift Supervisor position is a responsible, many faceted task requiring extensive training and experience to provide assurance of satisfactory performance under a variety of normal and abnormal plant conditions. The Shift Supervisor on duty at the time of the January 17, 1981 transient has more than ten (10) years nuclear experience and has been continuously employed at the FitzPatrick Plant for approximately eight (8) years, the past three (3) of which have been in this position. In addition, it should be noted that Operations Department Standing Order No. 1 states in part:

- "5.1.1 The Shift Supervisor has the responsibilities to ensure the safe operation of the plant under all conditions and that the facility is operated within the constraints of the facility licenses. This is "command decision responsibility".
- 5.1.2 The Shift Supervisor has the authority to initiate all actions required to carry out his responsibilities. This is "command decision authority".
- 5.1.4 The Shift Supervisor (SS) is the senior person on shift and shall be the only person to have command decision authority."

As noted in the inspection details, the operating shift, including the Shift Supervisor, was aware of the maintenance activity concerning the UPS motor generator set and in fact, had processed the Release for the motor generator set. The transient began as the Shift Supervisor was entering the Control Room. Based on his knowledge of the plant and the maintenance activities, he recognized that the probable cause of the transient was loss of the UPS system. His first actions relative to the transient were to verify that the personnel in the control room were completing the prescribed actions contained in Emergency Operating Procedure No. 25 titled "Reactor Scram" and to conduct a review of important safety parameters such as reactor water level. As part of this review the Shift Supervisor noted that of the seven (7) level indicators used during normal and transient conditions, four (4) were upscale (indicating properly) and three (3) were downscale (due to loss of power). Since there were two (2) Licensed Operators (and the Shift Technical Advisor) present in the control room conducting the actions specified by approved procedures and an additional Licensed Operator had left the control room to investigate the UPS

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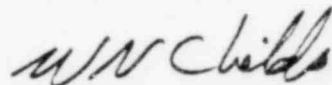
loss the Shift Supervisor judged that conditions were in control. At this point the Shift Supervisor's most immediate concerns were verification of reactor water level and investigation of the loss of UPS. As noted above, investigation of the loss of UPS had been initiated by a Licensed Operator which allowed the Shift Supervisor to leave the control room for a short time (less than 3 minutes) to verify reactor water level at a local panel.

The FitzPatrick Plant staff believes that, under the circumstances described and the broad authority and responsibilities given the Shift Supervisor in Operations Department Standing Order No. 1, this action was satisfactory.

EXAMPLE NO. 3

The FitzPatrick Plant staff concurs that this example was a serious departure from the written, approved procedures which govern protective tagging. As noted in the inspection report details, the plant management subjected the individual of concern to disciplinary action. This action resulted in the FitzPatrick Plant being in full compliance. No additional action is required.

Very truly yours,



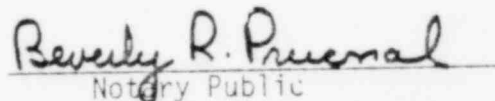
W. V. CHILDS FOR
RAYMOND J. PASTERNAK
RESIDENT MANAGER

RJP:VC:brp

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Subscribed and Sworn to before
me this 9th day of April, 1981


Notary Public

BEVERLY R. PRUCNAL, #4628499
Notary Public - State of New York
Appointed in Oswego County
My Commission Expires March 30, 1982