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New York Power Authority

April 29, 1994
JPN-94-021

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Generic Letter 92-01, Revision 1,
"Reactor Vessel Structural Integrity"

References:
1. NYPA letter, R. E. Beedle to NRC, "Response to Generic Letter 92-01, Revision 1," (IPN-92-031/JPN-92-037), dated July 9, 1992.
2. NYPA letter, R. E. Beedle to NRC, "Generic Letter 92-01, Revision 1, Response to Request for Additional Information," (JPN-93-062), dated August 27, 1993.
3. NRC letter, B. C. McCabe to W. A. Josiger, "Generic Letter (GL) 92-01, Revision 1, Reactor Vessel Structural Integrity," dated March 30, 1994.

During the NRC's review of the Authority's responses to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity," (References 1 and 2), the NRC identified one open issue for the James A. FitzPatrick Nuclear Power Plant.

The NRC concluded that the initial RT_{NDT} values for the FitzPatrick reactor vessel were not validated because the NRC has not approved the General Electric (GE) initial methodology used in the RT_{NDT} calculation. The BWR Owners' Group submitted a report GE-NE-523-109-0893, "Basis for GE RT_{NDT} Estimation Method," which the NRC considered insufficient to resolve this issue. GE is preparing a topical report to validate the methodology. The BWROG will obtain approval from its members to provide the GE topical report to the NRC staff for its review and approval. In Reference 3, the NRC requested information to close this issue for the FitzPatrick plant. The Authority's response to this request follows.

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1. A commitment to the BWROG effort or a schedule for a plant-specific analysis to resolve this issue.

   The Authority has endorsed GE-NE-523-109-0893 and is committed to the BWROG effort to validate the GE methodology for resolving the initial RT_{NDT} issue.

2. Provide confirmation of the plant-specific applicability of the topical report NEDO-32205, Revision 1, as specified in Appendix B to the NEDO.

   As stated in Reference 2, the Authority will be able to fully confirm the applicability of NEDO-32205, "BWR Owners' Group Topical Report on Upper Shelf Energy Equivalent Margin Analysis," when the next reactor vessel surveillance capsule is withdrawn and more surveillance weld charpy data becomes available. The next surveillance capsule is projected to be removed in 1997 based on anticipated plant capacity factor. The Authority will confirm full applicability of the NEDO at that time and will inform the NRC of the results. The Authority anticipates that this report will be applicable to the FitzPatrick plant.

3. Submit a request for approval of the topical report as the basis for demonstrating compliance with 10 CFR 50, Appendix G, Paragraph IV.A.1.

   In Reference 2, the Authority stated that it plans to use NEDO-32205, "BWR Owners' Group Topical Report on Upper Shelf Energy Equivalent Margin Analysis," as our licensing bases to demonstrate that all beltline welds have sufficient safety margins, equivalent to those required by 10 CFR 50, Appendix G. Since this response was submitted, the NEDO report was revised. The Authority hereby requests approval of Revision 1 of this NEDO as the basis for demonstrating compliance with 10 CFR 50, Appendix G, Paragraph IV.A.1 for the FitzPatrick plant.

4. Verify the accuracy of the JAF specific information in the Reactor Vessel Integrity Database.

   The Authority has reviewed the FitzPatrick specific information entered in the NRC's Reactor Vessel Integrity database. The values reported in Reference 3, Enclosure 1, "Summary File for Pressure-Temperature Limits," column 4, corresponding to the end-of-life (EOL) neutron fluence at vessel inner wall are incorrect. Other errors were identified in Reference 3, Enclosure 2, "Summary File for Upper Shelf Energy," columns 5 and 6 corresponding to the EOL upper-shelf energy (USE) at T/4 and to the EOL neutron fluence at T/4 from vessel inner wall. The corrections to Reference 3, Enclosures 1 and 2, are attached.

If you have any questions, please contact Mr. J. A. Gray, Jr.

Very truly yours,

William A. Josiger
Acting Executive Vice President

Attachments:

1. Corrections to "Summary File for Pressure-Temperature Limits" and "Summary File for Upper Shelf Energy."

2. List of commitments.

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
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Mr. Brian C. McCabe
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Washington, DC 20555

Attachment I to JPN-94-021

Corrections to "Summary File for Pressure-Temperature Limits" and "Summary File for Upper Shelf Energy"

New York Power Authority

James A. FitzPatrick Nuclear Power Plant

Summary File for Pressure-Temperature Limits

Plant Name	Beltline Ident.	Heat No. Ident.	ID Neut. Fluence at EOL/EFPY	IRT_{NDT}	Method of Determin. IRT_{NDT}	Chemistry Factor	Method of Determin. CF	%Cu	%Ni
Fitz-Patrick EOL: 10/17/2014	Lower Shell	C3394-1	~~2.51~~E18 1.96	-10°F	Plant Specific	73.6	Table	0.11	0.56
	Lower Shell	C3376-2	~~2.51~~E18 1.96	24°F [1]	Plant Specific	91	Table	0.13	0.60
	Lower Shell	C3103-2	~~2.51~~E18 1.96	-2°F [1]	Plant Specific	100	Table	0.14	0.60
	Lower Int. Shell	C3368-1	~~2.51~~E18 2.32	-10°F [1]	Plant Specific	81.8	Table	0.12	0.54
	Lower Int. Shell	C3501-1	~~2.51~~E18 2.32	-18°F [1]	Plant Specific	134	Table	0.18	0.60
	Lower Int. Shell	C3278-2	~~2.51~~E18 2.32	-10°F [1]	Plant Specific	91	Table	0.13	0.60
	Lower Int. Axial Welds 1-233A/C	13253/12008	~~2.51~~E18 2.32	-50°F	Plant Specific	223.9	Table	0.26	0.87
	Lower Shell Axial Welds 2-233A/C	27204/12008	~~2.51~~E18 1.96	-22°F [1]	Plant Specific	241.3	Table	0.25	0.99
	Circ. Weld 1-240	305414	~~2.51~~E18 2.32	-50°F	Plant Specific	203.75	Table	0.33	0.59

Reference for FitzPatrick

IRT, fluence, and chemical composition data are from July 9, 1992, letter from R. E. Beedle (PASNY) to USNRC Document Control Desk, subject: Response to Generic Letter 92-01, Revision 1

[1] Additional information required to confirm value.

5 Summary File for Upper Shelf Energy

Plant Name	Beltline Ident.	Heat No.	Material Type	USE at EOL/EFPY	1/4T Neutron Fluence at EOL/EFPY	Unirrad. USE	Method of Determin. Unirrad. USE
FitzPatrick EOL: 10/17/2014	Lower Shell	C3394-1	A 5338-1	75	~~1.7E18~~ 1.3	86	65%
	Lower Shell	C3376-2	A 5338-1	66	~~1.7E18~~ 1.3	77	65%
	Lower Shell	C3103-2	A 5338-1	70	~~1.7E18~~ 1.3	83	65%
	Lower Int. Shell	C3368-1	A 5338-1	58	1.7E18	67	65%
	Lower Int. Shell	C3301-1	A 5338-1	68	1.7E18	83	65%
	Lower Int. Shell	C3278-1	A 5338-1	~~76~~ 73	1.7E18	85	65%
	Lower Int. Axial Welds 1-233A/C	13253/ 12008	Linde 1092, SAW	~~76~~ 72	1.7E18	104	Direct
	Lower Shell Axial Welds 2-233A/C	27204/ 12008	Linde 1092, SAW	EMA[2]	~~1.7E18~~ 1.3	EMA[2]	---
	Circ. Weld 1-240	305414	Linde 1092, SAW	EMA[2]	1.7E18	EMA[2]	---

Reference for FitzPatrick

Fluence, chemical composition, and UUSE data are from July 9, 1992, letter from R. E. Beedle (PASNY) to USNRC Document Control Desk, subject: Response to Generic Letter 92-01, Revision 1

[2]Licensee must confirm applicability of Topical Report NEDO-32205, Rev. 1

Commitment Number	Commitment	Due Date
JPN-94-021-1	**Nuclear Operations:** The Authority will confirm full applicability of NEDO-32205, Revision 1, "BWR Owners' Group Topical Report on Upper Shelf Energy Equivalent Margin Analysis," following removal of the next surveillance capsule scheduled for 1997 based on anticipated plant capacity factor.	12/31/97
JPN-94-021-2	**Licensing:** The Authority will inform the NRC of the applicability of NEDO-32205, Revision 1.	12/31/97