

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION
CHANGES REGARDING DELETION OF TIME DELAY FOR
HPCI AND RCIC AUTOMATIC ISOLATION

(JPTS-89-022)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Docket No. 50-333

DPR-59

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TABLE 4.2-2 (Cont'd)

MINIMUM TEST AND CALIBRATION FREQUENCY FOR CORE AND CONTAINMENT COOLING SYSTEMS

Logic System Functional Test			Frequency
1)	Core Spray Subsystem	(7) (9)	Once/6 months
2)	Low Pressure Coolant Injection Subsystem	(7) (9)	Once/6 months
3)	Containment Cooling Subsystem	(9)	Once/6 months
4)	HPCI Subsystem	(7) (9)	Once/6 months
5)	HPCI Subsystem Auto Isolation	(7)	Once/6 months
6)	ADS Subsystem	(7) (9)	Once/6 months
7)	RCIC Subsystem Auto Isolation	(7)	Once/6 months
8)	ADS Relief Valve Bellow Pressure Switch	(7) (9)	Once/operating cycle

NOTE: See listing of notes following Table 4.2-6 for the notes referred to herein.

ATTACHMENT II

SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION
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I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications revise Table 4.2-2, "Minimum Test and Calibration Frequency for Core and Containment Cooling Systems," on page 80. The changes delete the reference to footnote (9) for items 5 and 7 on Table 4.2-2. This deletes the reference for functional testing of the time delay relays and timers for the High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) automatic isolation signals.

II. PURPOSE OF THE PROPOSED CHANGES

The Authority initiated LER 89-008-00, Reference 3, because the time delay relays for the HPCI and RCIC automatic isolation signals on high ambient temperature were not calibrated nor functionally tested since initial plant startup. The Authority subsequently determined that the time delay devices are not required for safe plant operation and implemented modifications to bypass the timer circuitry. The purpose of this proposed amendment is to revise Technical Specification Table 4.2-2 to reflect the current plant configuration.

The original design of the automatic isolation for HPCI and RCIC included two time delay devices for postulated steam supply line or valve packing leaks. The HPCI and RCIC steam lines are physically adjacent where the steam lines penetrate the primary containment and for a portion of the steam line route to their respective turbines. Steam leak detectors for both subsystems could be activated by a leak in either steam supply line. To avoid isolation of both subsystems due to a steam leak, time delay devices were installed to allow the investigation of leaks. If the source of the leakage were identified during the time delay, manual initiation of the appropriate steam supply line isolation could take place to avoid automatic isolation of both steam supply lines.

The FSAR contains a discussion regarding the physical separation of the HPCI and RCIC steam lines and the location of the steam line detectors. The potential for isolation of both steam supply lines as a result of a single steam leak was also considered. The use of time delay devices to provide time for assessment and manual isolation of the affected subsystem was not discussed. In addition, the High Energy Line Break analyses assumed no time delay except for normal instrument response time. It should also be noted that since the HPCI and RCIC subsystems are not required for mitigation of pipe breaks outside primary containment, a simultaneous isolation of both the HPCI and RCIC steam supply lines is within the scope of the plant design basis.

Based upon this information, the Authority modified the circuits for the HPCI and RCIC to bypass the time delay devices. To make the Technical Specifications consistent with the plant design, the FSAR, and the assumptions used in the plant's accident analyses, the requirement to test the time delay devices functionally for the HPCI and RCIC automatic isolation signals are being deleted.

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III. IMPACT OF THE PROPOSED CHANGES

Originally the design of the HPCI and RCIC automatic isolation signals included time delays to allow investigation of leaks in the steam supply lines and manual isolation of the affected system. The FSAR and the High Energy Line Break (HELB) analyses, however, did not take credit for the time delays. To make the HPCI and RCIC subsystems consistent with the FSAR and HELB analyses, these subsystems were modified to bypass the time delay circuits.

The proposed changes revise the Technical Specifications to reflect the plant design as described in the FSAR and the assumptions used in the plant's accident analyses. Operation of the plant in accordance with this proposed amendment is not considered a safety concern.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the James A. FitzPatrick Nuclear Power Plant in accordance with this proposed amendment would not involve a significant hazards consideration, as defined in 10 CFR 50.92, since the proposed changes would not:

1. involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes to Table 4.2-2 remove the requirement for functional testing of the time delay relays and timers for the HPCI and RCIC automatic isolation signals.

The original design of the HPCI and RCIC automatic isolation signal included time delays to allow investigation of leaks in the steam supply lines and the manual isolation of the affected system. The FSAR and HELB analyses, however, did not take credit for the time delays. In order to make the HPCI and RCIC subsystems consistent with the FSAR and HELB analyses, these subsystems were modified to bypass the time delays.

2. create the possibility of a new or different kind of accident from those previously evaluated. The Technical Specifications are being revised to be consistent with the design of the plant as described in the FSAR and the assumptions used in the HELB analyses.
3. involve a significant reduction in the margin of safety. The changes do not involve a reduction in the margin of safety, because the proposed changes to delete the functional testing of the time delay relays and timers is consistent with the assumptions used in the HELB analyses.

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V. IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of the proposed changes will not impact the ALARA or Fire Protection Programs at the FitzPatrick plant, nor will the changes impact the environment.

VI. CONCLUSION

These changes, as proposed, do not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, they:

- a. will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report;
- b. will not increase the possibility for an accident or malfunction of a different type from any evaluated previously in the safety analysis report;
- c. will not reduce the margin of safety as defined in the basis for any technical specification; and
- d. involve no significant hazards consideration, as defined in 10 CFR 50.92.

VII. REFERENCES

- 1. James A. FitzPatrick Nuclear Power Plant Updated Final Safety Analysis Report, Sections 7.4 and 14.6.
- 2. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER), dated November 20, 1972 and Supplements.
- 3. LER 89-008-00, dated June 16, 1989, "High Pressure Coolant Injection and Reactor Core Isolation Cooling Made Inoperable due to Procedure Deficiency Causing Missed Surveillance."