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March 24, 1993
JPN-93-020

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
**Closure of Action Items Identified in Response to
NRC Generic Letter 88-14, Instrument Air Supply
Problems Affecting Safety-Related Equipment**

- References:
1. NRC Generic Letter 88-14, "Instrument Air Supply System Problems Affecting Safety-Related Equipment," dated August 8, 1988.
 2. NYPA letter, R. E. Beedle to NRC dated September 10, 1991 (JPN-91-047), "Status of Action Items Identified in Response to NRC Generic Letter 88-14, Instrument Air Supply Problems Affecting Safety-Related Equipment."

Dear Sir:

The Authority has completed the four remaining tasks associated with Generic Letter 88-14, "Instrument Air Supply Problems Affecting Safety-Related Equipment" (Reference 1). In Reference 2, the Authority identified these tasks and committed to provide written notification when all requirements of the Generic Letter were completed.


The attached report describes the four tasks and the corrective actions taken to close out each item. These tasks are: 1) Revise the reactor analyst procedure for the scram inlet/outlet valves to reflect ASME Section XI test requirements; 2) Replace two air-operated valves with spool pieces; 3) Assess test results and, if required, complete corrective action; and 4) Review and approve the lesson plan for the loss of instrument air scenario.

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

Very truly yours,



Ralph E. Beedle

cc: Regional Administrator
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New York Power Authority
James A. FitzPatrick Nuclear Power Plant

Attachment to JPN-93-020

**RESPONSE TO NRC GENERIC LETTER 88-14
"INSTRUMENT AIR SUPPLY PROBLEMS
AFFECTING SAFETY-RELATED EQUIPMENT"**

NRC Generic Letter 88-14, "Instrument Air Supply Problems Affecting Safety-Related Equipment," asked each licensee to review NUREG-1275, Volume 2 and perform a design and operations verification of its instrument air system. The Authority has completed the remaining four tasks outlined in Reference 1. The current status of these items is presented below:

1. Reactor Analyst Procedure

In Reference 1, the Authority committed to revise Reactor Analyst Procedure 7.3.10, "Control Rod Scram Time Evaluation" by September 30, 1991, to reference ASME Section XI, 1980 Edition through Winter 1981 Addenda. This revision was completed on September 29, 1991.

2. Valve Replacement

In the past, electrical unit bay area cooler 16A and 16B temperature control valves (67TCV-119 and 120) failed closed on a loss of air instead of open as required for system operation. As an interim corrective measure, the service water bypass valves (46SWS-64A and B) around the temperature control valves were opened (and tagged to prevent repositioning) to ensure service water flow to unit coolers 67UC-16A and B on loss of instrument air during normal or emergency conditions.

An engineering review was performed which determined that removal of the temperature control valves instead of modifying their opening characteristics was the preferred option to resolve this concern. The function of these valves (i.e. control of area temperature) was transferred to the air side of the unit cooler system to reduce the potential for a silt buildup in the cooling water. This was the subject of Technical Specification Amendment 156. Since these valves are no longer required to control area temperature, the Authority committed to remove and replace these valves with spool pieces during the 1992 refueling outage. This modification was completed during the 1992 refueling outage.

New York Power Authority
James A. FitzPatrick Nuclear Power Plant

Attachment to JPN-93-020

3. Test Results

Cartridge filters were used to collect particulate samples and were examined using computer controlled scanning electron microscopy. Very little material was deposited on the sample media, confirming the performance of the installed afterfilters. For the initial test, the filters met the requirements of ANSI/ISA-S7.3 in filtering out particulates of 3 microns or larger. Subsequent tests have provided inconclusive results. In Reference 1, the Authority committed to assess the test results and, if required, to determine corrective actions. The Authority has determined that no modifications are necessary at this time.

Entrained particulate in instrument air systems has been a generic concern within the industry. The Authority is currently working with other utilities and EPRI to develop solutions to resolve this concern which is beyond the scope of Generic Letter 88-14.

4. Training Lesson Plan

In Reference 1, the Authority committed to revise and approve the Instructor Lesson Plan LPAOP-12, "Loss of Instrument Air" for Abnormal Operating Procedure AOP-12, "Loss of Instrument Air," by December 31, 1991. This lesson plan was developed to train personnel on the problems and consequences associated with common mode failures due to loss of instrument air. LPAOP-12 was approved on October 31, 1991.

New York Power Authority
James A. FitzPatrick Nuclear Power Plant

Attachment to JPN-93-020

References:

1. NYPA letter, R. E. Beedle to NRC, dated September 10, 1991 (JPN-91-047), "Status of Action Items Identified in Response to NRC Generic Letter 88-14, Instrument Air Supply Problems Affecting Safety-Related Equipment."
2. NRC letter, B. C. McCabe to R. E. Beedle, dated September 26, 1991, "Response to Generic Letter 88-14 for the James A. FitzPatrick Nuclear Power Plant (TAC No. 71660)."
3. NRC letter, B. C. McCabe to R. E. Beedle, dated June 27, 1991, "Status of Generic Letter 88-14 Response (TAC No. 71660)."
4. NYPA letter, R. E. Beedle to NRC, dated September 21, 1989 (JPN-89-061), "Response to Generic Letter 88-14, Instrument Air Supply Problems Affecting Safety-Related Equipment."
5. NRC letter, D. E. LaBarge to J. C. Brons, dated March 9, 1989, "Response Date for Generic Letter 88-14 (TAC No. 71660)."
6. NYPA letter, J. C. Brons to NRC, dated February 17, 1989 (JPN-89-007), "Generic Letter 88-14, Instrument Air Supply System Problems Affecting Safety-Related Equipment."
7. NRC Generic Letter 88-14, "Instrument Air Supply System Problems Affecting Safety-Related Equipment," dated August 8, 1988.