

POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE NEW YORK, N. Y. 10019

(212) 397-6200

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June 9 , 1982
JPN-82-50

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& GENERAL COUNSEL

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Post-TMI Requirements
Generic Letter No. 82-10

Reference: NRC Letter, D. G. Eisenhower to All Licensees
of Operating Power Reactors, dated May 5, 1982

Dear Sir:

Enclosed 1 contains the status or schedule, as requested by the
reference letter, of the following NUREG-0737 items:

- I.A.1.3.1 Overtime Limitations
- I.A.1.3.2 Minimum Shift Crew
- I.C.1 Short-term Accident and Procedures Review
- II.K.3.18 Modification of ADS Logic
- II.K.3.30 Small Break LOCA Model
- II.K.3.31 Compliance with 10 CFR 50.46
- III.A.1.2 Staffing Levels for Emergency Situations
- III.A.1.2 Upgrade Emergency Support Facilities
- III.A.2.2 Meteorological Data
- III.D.3.4 Control Room Habitability

The Power Authority considers the following items complete for the
FitzPatrick plant: I.A.1.3.1; II.K.3.30; and II.K.3.31. Items I.A.1.3.2
and II.A.1.2 (Staffing Levels for Emergency Situations) will be implement-
ed by November 30, 1982.

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The Authority will submit its position on Item II.K.3.18 by December 1, 1982. The additional time beyond September 30, 1982 is necessary to allow a review of the BWR Owners' Group generic evaluation, for its applicability to the FitzPatrick plant.

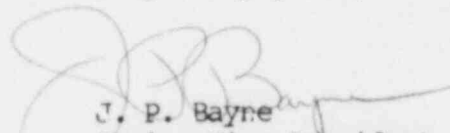
Item III.A.2.2 will be completed by January 1, 1983, except for implementation of the Class B model. As discussed in Enclosure 1, a schedule for the Class B model will be provided when final NRC guidance on the model is available.

The Power Authority will provide an implementation schedule for Item I.C.1 following NRC approval of the BWR Owners' Group Emergency Procedure Guidelines. It is expected that the NRC review will be completed by August 1, 1982.

As explained in detail in Enclosure 1, the Authority is awaiting final NRC guidance before providing an implementation schedule for Item III.A.1.2 (Upgrade Emergency Support Facilities).

If you have any further questions, please contact Mr. J. A. Gray, Jr. of my staff.

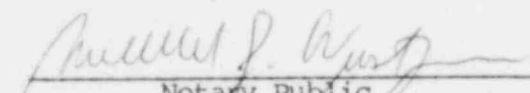
Very truly yours,


J. P. Bayne
Senior Vice President
Nuclear Generation

MITCHELL J. WEINSTEIN
Notary Public, State of New York
No. 30-4740
Qualified in Nassau County
Commission Expires March 30, 1983

State of New York
County of New York

Subscribed and sworn to before
me this day 9th of June 1982


Notary Public

cc: Mr. J. Linville
Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 136
Lycoming, New York 13093

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

NUREG-0737

POST - TMI REQUIREMENTS

(GENERIC LETTER No. 82-10)

ENCLOSURE 1 to JPN-82

I.A.1.3.1 Overtime Limitations

This NUREG-0737 item was fully implemented on December 18, 1980. In a May 21, 1982 letter from D.B. Vassallo to L.W. Sinclair, the NRC stated that the NUREG-0737 criteria for this item have been satisfied. The Power Authority considers this item complete for the FitzPatrick plant.

I.A.1.3.2 Minimum Shift Crew

The Authority will complete the implementation of this requirement by June 1, 1983. Previous implementation schedules and detailed justification were provided in letters from J. P. Bayne to D. G. Eisenhut dated December 4, 1980 (JPN-80-55) and from J. P. Bayne to T.A. Ippolito dated December 16, 1980 (JPN-80-58). However, for the reasons presented in item III.A.1.2, this item will not be completed until June 1, 1983.

I.C.1 Short-term Accident and Procedures Review

On June 1, 1982, the BWR Owner's Group submitted Revision 2 of the Emergency Procedure Guidelines to the NRC. At that time the staff committed to review the submittal for approval by August 1, 1982. Following NRC approval of the guidelines, the Authority will incorporate procedure revisions into the JAFNPP Integrated Schedule which was submitted in a letter from J. P. Bayne to H. R. Denton dated January 11, 1982. (JPN-82-6).

II.K.3.18 Modification of ADS Logic

The Power Authority addressed this item in a letter from J.P. Bayne to D. B. Vassallo dated March 31, 1982 (JPN-82-33). That letter stated that the Authority is participating in the ongoing BWR Owners' Group evaluation of ADS logic modifications. At the request of the BWROG, the NRC has extended the date for the submittal of proposed generic modifications to September 30, 1982.

The Authority will review these proposed generic modifications for applicability to the FitzPatrick plant when they become available. The Authority will submit a position on the need for plant specific modifications by December 1, 1982.

The extension of the submittal date from September 30 to December 1 is necessary because the Authority cannot endorse a generic evaluation as applicable to the FitzPatrick plant without first performing a thorough review. The December 1 date is also dependent upon the timely receipt of the Owners' Group generic evaluation.

II.K.3.30 Small Break LOCA Model

The General Electric Company submitted the final program results for this item in a letter from R. H. Buchholz to D. G. Eisenhut dated June 26, 1981 (MFN-132-81). In that letter, General Electric stated that the existing small break LOCA model satisfies the NUREG-0737 acceptance criteria and that no revisions are required.

In a letter from J. P. Bayne to T. A. Ippolito dated January 11, 1982 (JPN-82-7), the Authority stated that this item is complete for the FitzPatrick plant.

II.K.3.31 Compliance with 10 CFR 50.46

The General Electric review conducted in response to Item II.K.3.30 demonstrated that the existing plant unique analyses also satisfy the requirements of Item II.K.3.31. Therefore, this item is also complete for the FitzPatrick plant.

III.A.1.2 Staffing Levels for Emergency Situations

The Power Authority described a plan for resolution of this item in response to the revised criteria of Generic Letter No. 82-10, dated February 18, 1981. In a letter from J. P. Bayne to T. A. Ippolito dated April 21, 1981 (JPN-81-27), the Authority provided a detailed four phase implementation schedule for emergency shift manning at the FitzPatrick plant.

Justification for the schedule was provided in the April 21 letter and also in the Authority's December 4, 1980 letter (JPN-80-55). Because of the results of the March 1982 SRO examination, the Authority will not be able to add a second on-shift SRO until June 1, 1983. The Authority will schedule a re-examination for September of 1982 with the results expected in December of 1982. Based upon the successful completion of this schedule, SRO inplant training classes will start January 1, 1983 with a second SRO on-shift by June 1, 1983.

As stated in the April 21 letter, the program is based on a 60 minute call-out period. The Authority considers the 30 minute call-out as impractical to achieve and unnecessary for the FitzPatrick plant. The Power Authority considers the minimum shift crew adequate to manage the plant for the initial 60 minutes when additional personnel will be available.

III.A.1.2 Upgrade Emergency Support Facilities

The Power Authority addressed this NUREG-0737 requirement in detail in a letter from J. P. Bayne to D. B. Vassallo dated April 1, 1982 (JPN-82-34). In that letter, the Authority stated that the submittal of a formal implementation schedule was inappropriate for the following reasons: (1) the NRC had not yet finalized the acceptance criteria for emergency response capabilities; and, (2) Mr. Dircks had committed to have the Committee to Review Generic Requirements (CRGR) evaluate the existing requirements. The Authority's response also identified the industry groups in which the Authority is participating in order to complete this NUREG-0737 item.

The Power Authority still considers it inappropriate to submit an implementation schedule. The CRGR review has been completed and in SECY-82-111 dated March 11, 1982, Mr. Dircks presented the committee's recommendations to the Commissioners. Briefly, the SECY document requested Commissioner

approval for a set of basic emergency response capability requirements and Commissioner approval for the staff to work with licensees to develop plant-specific implementation schedules.

Following resolution of these issues within the NRC, the Authority will be able to provide a meaningful implementation schedule for Item III.A.1.2 consist with an integrated schedule.

III.A.2.2 Meteorological Criteria for Emergency Preparedness

As previously stated in an April 5, 1982 letter (J.P. Bayne to D.B. Vassallo, JPN-82-36), the Authority anticipates that a site specific modeling system, including data from an inland meteorological tower, will be operational by January 1, 1983. An interim dose assessment system, which will provide enhanced assessment capability until the complete upgraded system is functional, will be operational July 1, 1982.

It is the Authority's understanding that the NRC is reappraising the Class B model described in NUREG-0654. The Authority will incorporate an implementation schedule for the Class B model into the JAFNPP Integrated Schedule when the NRC staff has establish final guidance.

III.D.3.4 Control Room Habitability

The Authority's detailed evaluation and schedule for completion of this NUREG-0737 item was provided in a letter from J.P. Bayne to T.A. Ippolito dated August 13, 1981 (JPN-81-60). The plant modifications required by the evaluation were subsequently incorporated into the JAFNPP Integrated Schedule. This schedule shows that the required modifications will be completed by the end of the 1983 refueling outage.