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July 13, 1982  
JPN-82-61

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

Attention: Mr. Harold A. Denton, Director  
Office of Nuclear Reactor Regulation

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Reassessment of Fire Protection  
Features for Conformance to Appendix R to 10 CFR 50

- References: 1. NRC letter, H.R. Denton to L.W. Sinclair dated  
May 10, 1982.
2. PASNY letter, J.P. Bayne to H.R. Denton dated  
February 26, 1982. (JPN-82-24).
3. PASNY letter, J.P. Bayne to T.A. Ippolito dated  
November 20, 1980 (JPN-80-53).

Dear Sir:

In Reference 1, the NRC granted the Power Authority an Exemption from certain scheduler requirements contained in 10 CFR 50.48 (c). The Exemption extended the date for the submittal of a reassessment of the fire protection features of the FitzPatrick plant, for conformance to the specific requirements of Appendix R to 10 CFR 50, to February of 1982. The letter which transmitted the Exemption also granted a 60 day grace period to allow the Authority additional time to assure that our Appendix R submittal, entitled Appendix II to the Safe Shutdown Analysis (Reference 2) is complete.

Subsequent to the Power Authority's receipt of the Exemption, several telephone conversations were held with the NRC staff. The staff identified several areas in which most licensee submittals have been incomplete and which they felt were also incomplete in the Authority's submittal.

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Other issues were also addressed during these telephone conversations but the Authority was unable to reach a full understanding of the staff's concerns. Therefore a meeting between Authority personnel and the NRC staff was held in Bethesda on June 29, 1982. At the meeting, we came to the understanding that the scope of the staff's concerns was far greater than what had previously been known to us. Accordingly, the Authority's response would have to be expanded greatly to address these concerns.

Also as a result of the telephone conversations and meeting, it became apparent to the Power Authority that the NRC staff was addressing Appendix II to the Safe Shutdown Analysis (Reference 2) without considering the Safe Shutdown Analysis (Reference 3) itself. It was the Authority's intent that both documents be considered together as a response to Appendix R. Appendix II responded only to Section III.G.2 of Appendix R. The Safe Shutdown Analysis was intended to be considered by the staff as addressing fires in the Control, Cable Spreading, or Relay Rooms. Since the staff was addressing only Appendix II, the inference was made that these three areas would meet the separation criteria of III.G.2. The Power Authority never intended that such an inference be made.

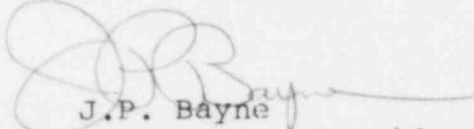
To resolve all of the staff's concerns known to us (including the above), the Authority submits Enclosure 1. This report supercedes Appendix II to the Safe Shutdown Analysis in its entirety. It provides extensive reevaluations of: all fire areas and zones in the Reactor Building; and, the capability to achieve safe shutdown in the event of a fire in the Control, Cable Spreading or Relay Room. Additional evaluations are also provided regarding: the information requested in Generic Letter 81-12; spurious actuation; previously submitted exemption requests; and, completeness of the submittal.

To the extent that the NRC staff requires additional information on these issues, the Power Authority will be happy to provide the information on request. Thus with regard to any requests made by the NRC staff regarding these new issues, the Power Authority requests, in accordance with the provisions of 10 CFR 50.48 (c), an exemption from the scheduler requirements contained therein to extend the date for the final submittal of a complete reassessment of the conformance of the FitzPatrick plant to Appendix R of 10 CFR 50.

Subsequent to submitting the enclosed report, the Authority will continue its verification of the information provided to the staff. In the event that any clarification of the information contained in the report is identified, the Authority will provide such clarification as expeditiously as possible.

Our staff is available to discuss the enclosed report and the above exemption request with you should any questions arise. Further, if the NRC staff determines that additional information is needed to assist in its review, the Authority is prepared to furnish such information as expeditiously as is reasonably possible. If you have any questions regarding this matter, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,



J.P. Bayne  
Senior Vice President  
Nuclear Generation