Attachment I to JPN-93-067

PROPOSED TECHNICAL SPECIFICATION CHANGES
CONTAINMENT COOLING SUBSYSTEM
LOGIC FUNCTIONAL TEST CALIBRATION

(JPTS-92-028)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

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		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 notes following Table 4.2-5.

SAFETY EVALUATION FOR PROPOSED TECHNICAL SPECIFICATION CHANGE CONTAINMENT COOLING SUBSYSTEM LOGIC FUNCTIONAL TEST CLARIFICATION (JPTS-92-028)

I. DESCRIPTION OF THE PROPOSED CHANGE

The proposed change to the James A. FitzPatrick Technical Specification is described below.

Minor changes in format, such as type font, margins or hyphenation, are not described in this submittal. These changes are typographical in nature and do not affect the content of the Technical Specifications.

Page 80, Table 4.2-2

Delete note "(9)" from the test frequency column for the Containment Cooling Subsystem.

II. PURPOSE OF THE PROPOSED CHANGE

The proposed change revises Technical Specification Table 4.2-2 "Minimum Test and Calibration Frequency for Core and Containment Cooling Systems" to remove a testing requirement for the Containment Cooling Subsystem. Technical Specification Table 4.2-2, note 9 requires calibration of time delay relays and timers in the logic system functional test for the Containment Cooling Subsystem. The Containment Cooling Subsystem is manually initiated to remove heat from the containment in the event of testing, transients or accidents that add heat to the containment. It does not contain time delay relays or timers. The proposed change will remove this unnecessary test requirement.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGE

Removing the requirement to test time delay relays and timers during the Containment Cooling Subsystem logic system functional test has no adverse affects on plant safety. The proposed change removes a test requirement by revising Technical Specification Table 4.2-2. The change will not require modification to hardware, operations or procedures and will not alter the conclusions of the plants accident analyses as documented in the FSAR or the NRC SER. This change will have no affect on either Containment Cooling Subsystem operation or testing.

1. Containment Cooling Subsystem Operation

   The Containment Cooling Subsystem does not contain time delay relays or timers (References 1 and 2). The Containment Cooling Subsystem is manually initiated (References 2 and 3). Therefore, testing of time delay relays or timers for the logic system functional test is not applicable to the Containment Cooling Subsystem. The proposed change revises Technical Specification Table 4.2-2 to reflect the previously reviewed and approved system design for the Containment Cooling Subsystem and has no adverse affect on plant safety.

2. Containment Cooling Subsystem Testing

Technical Specification Table 4.2-2 requires a logic system functional test of the Containment Cooling Subsystem once every six months. This test (Reference 4) checks the logic of the open permissive circuitry (i.e., the valve interlocks that prevent inadvertent manual initiation of containment cooling before Low Pressure Coolant Injection requirements are met) for the Containment Cooling mode of the RHR system. The test does not require testing of time delay relays and timers because the system has none. Therefore removal of the test requirement will not require any changes to the Containment Cooling Subsystem Surveillance Test procedure.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the FitzPatrick plant in accordance with the proposed Amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92, since it would not:

1. involve a significant increase in the probability or consequences of an accident previously evaluated.

   Use of the Containment Cooling Subsystem as an accident mitigation system is unaffected by the proposed change. The Containment Cooling Subsystem is a manually initiated system which removes heat from the containment in the event of testing, transients or accidents that add heat to the containment. The proposed change removes a testing requirement Table 4.2-2, note 9 to calibrate time delay relays and timers as part of the logic system functional test. The Containment Cooling Subsystem does not contain time delay relays or timers. Plant accident analyses, operations, hardware and procedures are not affected by the Technical Specification change. The nature of this change will not cause any increase in the probability or consequences of previously evaluated accidents.

2. create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed change involves no modifications to hardware, analyses, operations or procedures. The Containment Cooling Subsystem is manually initiated and does not contain time delay relays or timers. The proposed change makes Technical Specification Table 4.2-2 consistent with the previously reviewed and approved system design. The nature of this change is such that no new or different kind of accident can be created.

3. involve a significant reduction in the margin of safety.

   The results of the plant accident analyses continue to bound operation under the proposed changes so there is no reduction in the margin of safety. The Containment Cooling Subsystem is manually initiated and does not contain time delay relays or timers. Therefore system operation and surveillance testing remain

unaffected by the proposed change. A revision of this nature will not cause a reduction in the margin of safety.

V. IMPLEMENTATION OF THE PROPOSED CHANGE

Implementation of the proposed change removes a testing requirement to calibrate time delay relays and timers in the logic system functional test for the containment cooling subsystem. This change will not affect the ALARA or Fire Protection Programs at the FitzPatrick plant, nor will the changes affect the environment.

VI. CONCLUSION

The change, as proposed, does not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, it:

1. will not change the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;

2. will not increase the possibility of an accident or malfunction of a type different from any previously evaluated in the Safety Analysis Report; and

3. will not reduce the margin of safety as defined in the basis for any technical specification.

The change involves no significant hazards consideration, as defined in 10 CFR 50.92.

VII. REFERENCES

1. General Electric Drawing, "Elementary & Interconnection Diagram RHR System," Drawing Number 791E461 sheets 1 through 25 (through latest revision).

2. James A. FitzPatrick Nuclear Power Plant Updated Final Safety Analysis Report Section 4.8 "Residual Heat Removal System," through Revision 5, dated January 1992.

3. James A. FitzPatrick Nuclear Power Plant Operating Procedure, OP-13 "Residual Heat Removal System," Revision 68, dated January 25, 1993.

4. James A. FitzPatrick Nuclear Power Plant Operations Surveillance Test Procedure, ST-35A "Containment Spray/Cooling System Logic Functional Test," Revision 21, dated August 8, 1991.

5. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER), dated November 20, 1972, and Supplements.

Attachment III to JPN-93-067

PROPOSED TECHNICAL SPECIFICATION CHANGE
CONTAINMENT COOLING SUBSYSTEM
LOGIC FUNCTIONAL TEST CALIBRATION
MARKUP OF TECHNICAL SPECIFICATION PAGES

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NOTE: See notes following Table 4.2-5.

Amendment No. 3, 89, 189, 191,