ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

SURVEILLANCE, AUDIT FREQUENCY AND ADMINISTRATIVE CHANGES

POWER AUTHORITY OF THE STATE OF NEW YORK
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

Amendment No.

156r

TABLE 3.6-1b SAFETY RELATED MECHANICAL SNUBBERS

SNUBBER NO.	LOCATION	ELEVATION	ACCESSIBLE OR INACCESSIBLE	HIGH RADIATION ZONE DURING SHUTDOWN	ESPECIALLY DIFFICULT TO REMOVE
10-7B-S3	Crescent Area RHR-45B	239'	A	NO	NO
10-9A-S40	Crescent Area MOV-65B	246'	A	YES	NO
10-13A-S112	Reactor Building 12"-W20-302-13A	315'	A	NO	NO
10-15B-S124A 10-15B-S124B	Crescent Area 16"-W20-302-15B	256'	A	NO	NO
10-15B-S125A 10-15B-S125B	Crescent Area MOV-39B	256'	A	NO	NO
10-3B-S153	Crescent Area 24"-W20-152-3B	232'	A	NO	NO
10-35-S221A	Reactor Building 4"-W20-302-35	336'	A	NO	NO
10-9A-S254	Crescent Area 16"-W20-302-9A	262'	A	NO	NO
10-9B-S286	Crescent Area 16"-W20-302-9B	253'	A	NO	NO
10-15A-S304	Crescent Area 16"-W20-302-15A	256'	A	NO	NO
10-15A-S303	Crescent Area 24"-W20-152-3B	232'	A	NO	NO
10-15A-S307 10-15A-S308	Crescent Area MOV-39A	256'	A	NO	NO
10-15B-S119A	Crescent Area 16"-W20-302-15B	256'	A	NO	NO

B. Crescent Area Ventilation

Crescent area ventilation and cooling equipment shall be operable on a continuous basis whenever specification 3.5.A, 3.5.B, and 3.5.C are required to be satisfied.

1. From and after the date that more than one unit cooler serving ECCS components in the same compartment are made or found to be inoperable, all ECCS components in that compartment shall be considered to be inoperable for purposes of specification 3.5.A, 3.5.C, and 3.5.D.

C. Battery Room Ventilation

Battery room ventilation shall be operable on a continuous basis whenever specification 3.9.E is required to be satisfied.

1. From and after the date that one of the battery room ventilation systems is made or found to be inoperable, its associated battery shall be considered to be inoperable for purposes of specification 3.9.E.

B. Crescent Area Ventilation

Unit coolers serving ECCS components shall be checked for operability once/3 months

1. When it is determined that two unit coolers serving ECCS components in the same compartment are made or found inoperable, reactor operation may continue for 7 days unless one is made operable earlier.

2. Temperature indicator controllers shall be calibrated once/operating cycle.

3. If 3.11.B.1 cannot be met, the reactor shall be placed in a cold condition within 24 hours.

C. Battery Room Ventilation

Battery room ventilation equipment shall be checked for operability once/week.

1. When it is determined that one battery room ventilation system is inoperable, the remaining ventialtion system shall be checked for operability and daily thereafter.

2. Temperature transmitters and differential pressure switches shall be calibrated once/operating cycle.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.

d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.

e. The Facility Emergency Plan and implementing procedures at least once per 12 months.

f. The Facility Security Plan (including the Safeguards Contingency Plan) and implementing procedures at least once per 12 months.

g. Any other area of facility operation considered appropriate by the SRC or the Senior Vice President-Nuclear Generation.

h. The Facility Fire Protection Program and implementing procedures at least once per two years.

i. An independent fire protection and loss of prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel an outside fire protection firm.

j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

6.5.2.9 AUTHORITY

The SRC shall report to and advise the Senior Vice President Nuclear Generation on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

6.5.2.10 RECORDS

Records will be maintained in accordance with ANSI 18.7-1972. The following whall be prepared, approved and distributed as indicated below:

a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Senior Vice President-Nuclear-Generation within 14 days after the date of the meeting.

b. Reports of review encompassed by Section 6.5.2.7 above shall be prepared, approved and forwarded to the Senior Vice President-Nuclear-Generation within 14 days following completion of the review.

c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President-Nuclear-Generation and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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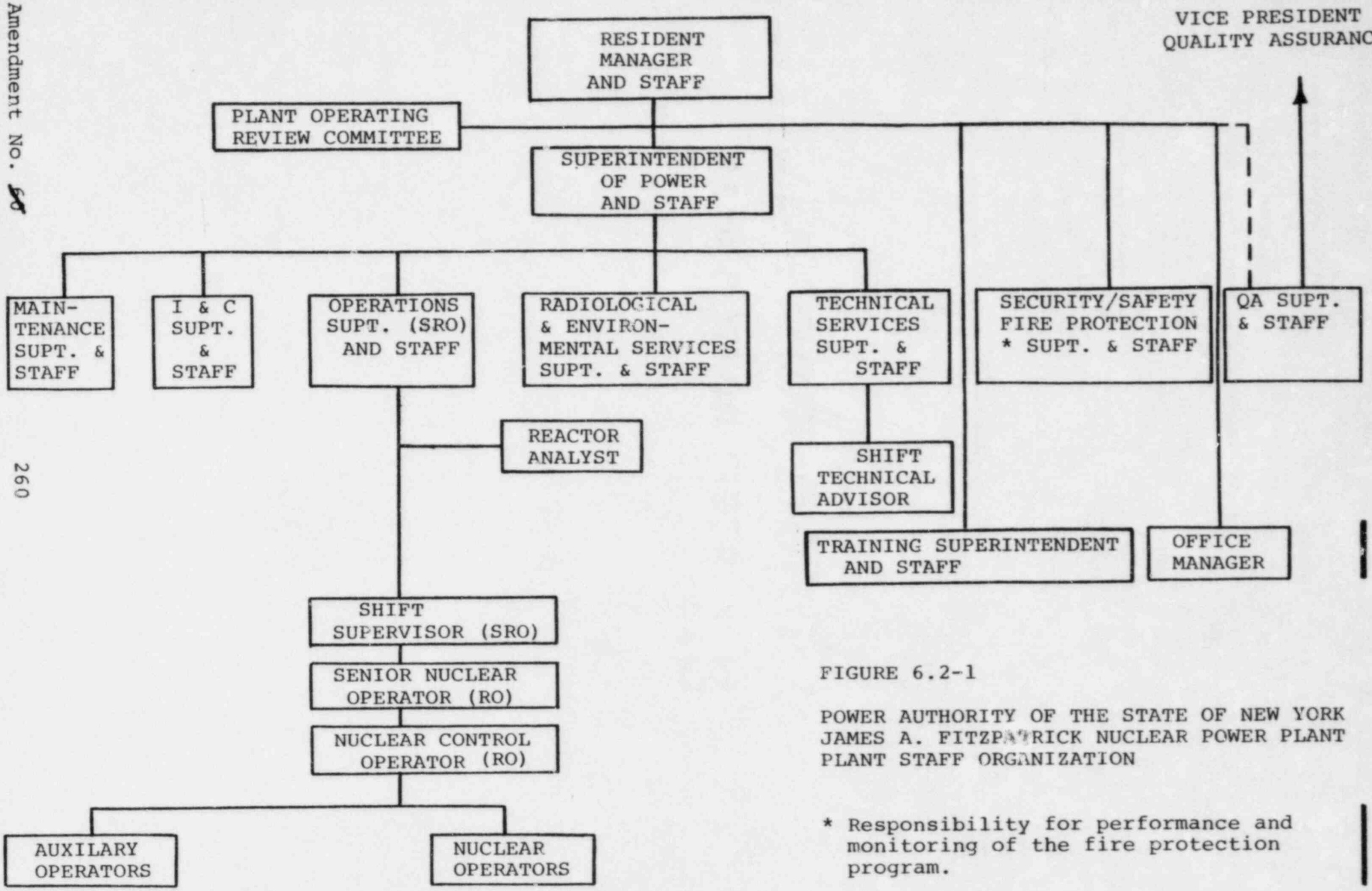

FIGURE 6.2-1

POWER AUTHORITY OF THE STATE OF NEW YORK
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
PLANT STAFF ORGANIZATION

* Responsibility for performance and monitoring of the fire protection program.

SRO - SENIOR REACTOR OPERATOR
RO - REACTOR OPERATOR

ATTACHMENT II

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

SURVEILLANCE, AUDIT FREQUENCY AND ADMINISTRATIVE CHANGES

POWER AUTHORITY OF THE STATE OF NEW YORK
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333

Section I - Description of the Changes

Table 3.6-1b (page 156r, "Safety Related Mechanical Snubbers") has been revised to incorporate a minor renumbering of the snubbers and the addition of a sixteenth snubber.

Figure 6.2-1, "Plant Staff Organization" on page 260 is updated to show that the Security and Safety Superintendent has responsibility for performance and monitoring of the fire protection program, in accordance with our previous commitment.

Section 4.11.B (page 239, "Crescent Area Ventilation") is revised to require that unit coolers serving ECCS components are checked for operability once per three months, rather than during the surveillance testing of the associated pumps, as currently required.

In Section 6.5.2.8(e) on page 252a, the audit frequency for emergency preparedness and safeguards contingency plans is revised to agree with the requirements of parts 73.40(d) and 50.54(t) of Title 10 of the Code of Federal Regulations.

Section II - Purpose of the Changes

The changes to Table 3.6-1b will update this list of safety related snubbers to include a new, sixteenth unit. In addition, one of the snubber numbers has been changed for clarity. (Please note that this same page was changed in a previous amendment application dated July 13, 1981. As of this date, this application amendment has not been issued by the Commission. The page included in Attachment II of this application supercedes the previously submitted page.)

One of the two changes to Figure 6.2-1 incorporates an existing NRC commitment into the FitzPatrick Technical Specifications regarding the Security and Safety Superintendent's job function. The second changes the "Training Coordinator" block to read "Training Superintendent and Staff" to agree with current Authority organization and titles.

The current Section 4.11.B (Crescent Area Ventilation) requires excessive testing, is inconsistent with ALARA and does not improve reliability. The proposed test frequency (once every 3 months) corresponds to the frequency stated in the Inservice Inspection Valve Test Program for unit cooler temperature control valves. The present specification results in several tests of unit coolers each month. This is because current specifications require unit cooler tests with each LPCI, Core Spray and HPCI operability and flow rate test. Personnel performing this testing are therefore required to spend additional time in the radiation areas in which these unit coolers are located. Furthermore, there are heat loads in the crescent areas which require that these unit coolers function to maintain normal temperatures. These heat loads include ambient

(warm weather) sources, continuously heated steam supply lines to HPCI and RCIC, and non-emergency operation of ECCS components (e.g. for surveillance testing, shutdown cooling or suppression pool cooling and level maintenance.) Thus, crescent area temperature provides a continuous indication of unit coolers operability. A quarterly surveillance test adequately ensures reliability.

In Section 6.5.2.8(e) (page 252a), the audit frequencies for emergency preparedness and safeguards contingency plans (References f and g) are revised to agree with Title 10 of the Code of Federal Regulations, parts 50.54(t) 73.40(d), respectively. We were notified of the need for this change via Reference f and g. This is clarifying, and made at the request of the Commission.

Section III - Impact of the Changes

Figure 6.2-1 and Table 3.6-1b will be updated to reflect changes already in effect at FitzPatrick and therefore will not impact plant operation.

The reduced surveillance testing required by Section 4.11.B will reduce personnel radiation exposure while maintaining a high level of reliability and operability for these unit coolers.

These changes will not have any impact on the environment. The changes as proposed will not impact the Fire Protection Program at the James A. FitzPatrick Nuclear Power Plant.

Section IV - Implementation of the Change

Reduced personnel radiation exposure will result from reduced surveillance test requirements.

Section V - Conclusion

The incorporation of these changes: a) 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; b) will not increase the possibility of an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; and c) will not reduce the margin of safety as defined in the basis for any Technical Specification; and d) does not constitute an unreviewed safety question.

Section VI - References

(a) James A. FitzPatrick Nuclear Power Plant Final Safety Analysis Report (FSAR).

(b) James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER).

(c) J.P. Bayne (PASNY) to T.A. Ippolito (USNRC) dated July 13, 1981 regarding Proposed Technical Specification Changes Related to Snubber Surveillene (JPN-81-51).

(d) C.A. McNeill, Jr. (PASNY) to R.C. Haynes (USNRC) dated May 28, 1982 regarding I.E. Bulletin No. 81-01, (JAFP-82-0577).

(e) I.E. Bulletin No. 81-01, "Surveillance of Mechanical Snubbers" dated January 27, 1981.

(f) Generic Letter No. 82-17, D.G. Eisenhut (NRC) to all Licensees dated October 1, 1982.

(g) Generic Letter No. 82-23, D.G. Eisenhut (NRC) to all Licensees dated October 30, 1982.