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April 12, 1983  
JPN-83-32

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

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

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Integrated Schedule for Plant Modifications

- References: 1. PASNY letter, J.P. Bayne to H.R. Denton, dated  
January 11, 1982 (JPN-82-6), on the same subject.
2. NRC Letter, D.G. Eisenhower to All Licensees of  
Operating Reactors, Applicants for Operating Licenses  
and Holders of Construction Permits, regarding  
Supplement 1 to NUREG - Emergency Response  
Capability Requirements, dated December 17, 1982  
(Generic Letter No. 82-33).

Dear Sir:

On October 15, 1981, the Power Authority met with members of your staff to discuss the Authority's schedule for meeting NRC implementation dates for post-TMI and other regulatory requirements. The Authority's principal concern in meeting the mandated implementation dates was the completion of the large number of backfit modifications within the short time allotted, without adversely affecting the safe operation of the plant.

To eliminate the potential for a negative impact on safety and to meet NRC requirements in a timely and responsive manner, the Power Authority submitted a proposed Integrated Schedule via Reference 1. This schedule integrated NRC mandated modifications with plant improvement and maintenance activities, which are necessary to assure the continued safe and reliable operation of the plant. The bases for the schedule were also detailed in Reference 1.

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The Power Authority requested that you review and concur with the schedule. To date we have not received a response to our request. However the need for such a schedule continues to exist due to the large number of ongoing plant modifications which are being implemented in accordance with regulatory requirements. Therefore, the Authority has been working to the Integrated Schedule and updating it as necessary, to incorporate new NRC requirements and plant needs.

Enclosure 1 contains the latest revision (Revision 6) of the Integrated Schedule. It identifies the completion date for each modification or other activity, and the duration of time required for completion. The durations shown include the time required for analyses, engineering and design, procurement, installation and preoperational testing. Items for which the completion dates were extended, beyond the original date committed to by the Authority or mandated by the NRC, are marked with an asterisk.

Enclosure 2 contains Revision 5 of the Integrated Schedule. This revision is submitted to identify the large number of plant modifications, inspections or other plant activities which have been completed in accordance with regulatory requirements. These items are marked "COMP" on Revision 5 of the schedule. They have been deleted from Revision 6 for clarity and to allow for the addition of new items.

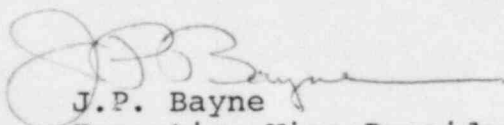
The Authority developed Revision 6 to the Integrated Schedule in light of the current demands on our resources, and the estimated demands resulting from Reference 2. In Reference 2 the Authority was requested to submit, in accordance with 10 CFR 50.54(f), a proposed schedule for meeting NRC emergency response capability (ERC) requirements. The Authority's ERC schedule is currently being developed and it will take into consideration the resources dedicated to meet the enclosed Integrated Schedule. If necessary, further revisions will be made to the Integrated Schedule following completion of the ERC schedule.

Since each schedule represents major allocations of the Authority's resources, they could not be developed independently of one another. They also cannot be reviewed independently of one another by the NRC, if an accurate perception of the Authority's efforts to meet regulatory requirements is desired.

The Power Authority is diligently working to meet Revision 6 of the Integrated Schedule. This schedule represents our best effort to meet NRC requirements without adversely impacting plant safety. The Authority requests your review of, and concurrence on, the Integrated Schedule.

The Authority's staff is available to discuss the Integrated Schedule with you at any time. If you have any questions, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'J.P. Bayne', with a long horizontal flourish extending to the right.

J.P. Bayne  
Executive Vice President  
Nuclear Generation

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

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