

James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315 342.3840



Corbin McNeill
Resident Manager

June 13, 1983
JAFP 83-0612

United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Attention: Thomas T. Martin, Director
Division of Engineering & Technical Programs

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO.: 50-333
INSPECTION NO. 83-10

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Deviation transmitted by your letter dated May 16, 1983, as received by the undersigned on May 19, 1983. This refers to the inspection conducted by Mr. W. Rekito of your office on April 12-15, 1983, at the FitzPatrick Nuclear Power Plant.

RESPONSE TO NOTICE OF DEVIATION

- A. "-- The licensee has not specified a limiting value of full stroke time for more than 50 power operated valves included in the inservice testing program and therefore, this aspect of the valves operational readiness is not being evaluated as required by the code."

The Authority agrees with this deviation.

The fundamental cause of this deviation was:

Inability to obtain required technical guidance in a timely manner. The Authority requested an interpretation of this requirement from American Society of Mechanical Engineers (ASME) and a basis for setting the limiting stroke times in August of 1982. The ASME response had not been received at the time of this inspection.

The Immediate Corrective Action was: ASME responded to our inquiry on April 20, 1983 and provided the required guidance.

United States Nuclear Regulatory Commission
Attention: Thomas T. Martin, Director
SUBJECT: NRC INSPECTION 50-333/83-10

June 13, 1983
JAFP 83-0612
Page -2-

Permanent Corrective Action will be as follows:
Compliance with the requirement will be completed by September 1, 1983.

"-- The licensee has established alternate Acceptance Criteria ranges for the hydraulic performance evaluation on all 15 pumps included in the in-service testing program. The corrective action range for several of the pumps was expanded to +25 percent of the reference value without clear justification for doing so. In addition, the station procedures permit reference values to be determined from an average or be typical of several sets of test data."

The Authority agrees with this finding.

The fundamental cause of this deviation was:

Initially, pump test data exhibited significant variability. This was attributed to non-repeatability of testing methods, instrument fluctuation, and varying degrees of operator precision in establishing reference test conditions. It was evident that initially the Code-specified ranges could not be met even though the data scatter did not indicate equipment degradation. It was decided to use a statistical approach in establishing pump test acceptance criteria. Recent representative data has been analyzed and averaged. Acceptable ranges were defined as being within two standard deviations of the mean. Required action ranges were defined as being any data greater than three standard deviations from the mean. If this method provided larger allowable ranges than the Code, the statistical limits were applied. The observed variability in pump test data was also the basis for choosing average or representative test data as reference values.

The Immediate and Permanent Corrective Action is as follows: Since this is a continuing process, there was no specific immediate action. The variability in pump test data is being decreased by improving surveillance test procedures and increased operator attention to the requirements of the ISI program. The re-evaluation of the test acceptance criteria will also be an on-going process. Furthermore, all pump test allowable ranges will be recalculated not later than June 1, 1984. A specific relief request will be generated for the newly calculated ranges that are determined

United States Nuclear Regulatory Commission
Attention: Thomas T. Martin, Director
SUBJECT: NRC INSPECTION 50-333/83-10

June 13, 1983
JAFP 83-0612
Page -3-

to be outside the ASME specified range. Technical Specifications define what is necessary on a system basis so there is no safety significance associated with this approach or time frame.

- B. "By letter to the NRC dated October 9, 1980 the licensee committed to expanding the inservice testing program by including all safety related valves regardless of their ASME code classification.

Contrary to the above, as of April 15, 1983 the licensee has not revised the inservice testing program to include 54 Containment Isolation Valves previously omitted or safety related valves in portions of the seven plant systems designated as "augmented" in the inservice testing program submittal to the NRC."

The Authority agrees with this finding.

The fundamental cause of this deviation was:

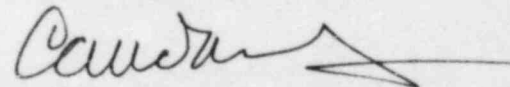
Confusion and misunderstandings have existed between branches of the NRC and the Authority over what testing had been committed to under the ISI program.

There was no Immediate Corrective Action.

Permanent Corrective Action will be as follows:
It is now mutually understood that the ISI program must include the "54 Containment Isolation Valves previously omitted" and safety related valves in the "augmented" systems. The program will be revised to include those valves. Specific testing procedures will be developed by June 1, 1984.

The Authority will have a Plant Performance and Reliability Supervisor by 1 September, 1983. The individual will have responsibility for the ISI Program and will establish the necessary management controls.

Very truly yours,



CORBIN A. McNEILL, JR.

CAM:JP:fah

Distribution:

Leroy W. Sinclair, NYPA, WPO
J. P. Bayne, NYPA, WPO
R. A. Burns, NYPA, WPO
T. Dougherty, NYPA, WPO
G. M. Wilverding, NYPA, WPO
J. A. Gray, Jr., NYPA, WPO

R. J. Converse, NYPA, JAF
M. C. Cosgrove, NYPA, JAF
R. Baker, NYPA, JAF
NRC Resident Inspector
NRCI 83-10 File
Document Control Center

CERTIFIED MAIL - RETURN RECEIPT REQUESTED