

May 3, 1984
JPN-84-27

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

Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Proposed Revisions to the Technical Specifications
Regarding Safety Related Hydraulic and Mechanical
Snubbers (PTS-81-03)

- References:
1. PASNY letter, J. P. Bayne to T. A. Ippolito, dated July 13, 1981 (JPN-81-51), regarding same subject.
 2. NRC letter, D. B. Vassallo to J. P. Bayne, dated February 3, 1984, regarding same subject.

Dear Sir:

In Reference 1, the Authority submitted a request for an amendment to the snubber surveillance requirements in the FitzPatrick Technical Specifications. Reference 2 requested that the Authority address questions or positions generated by the NRC during a comparison of Reference 1 to the Standard Technical Specifications.

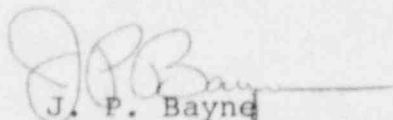
The Authority's response is provided in Attachment 1 to this letter. Based on this response, the Authority will submit a revised Technical Specification amendment request by June 13, 1984.

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If you have any questions, please contact Mr. J. A. Gray, Jr.
of my staff.

Very truly yours,



J. P. Bayne
Executive Vice President
Nuclear Generation

cc: Office of the Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 136
Lycoming, New York 13093

ATTACHMENT 1

James A. FitzPatrick Nuclear Power Plant
Technical Specifications Regarding Safety Related
Hydraulic and Mechanical Snubbers (PTS-81-03)

The item numbers shown below correspond to those in Appendix A of Reference 2, "Data Comparison of Licensee's Proposed TS versus NRC Model STS."

Item:

I.C. NRC Position: The licensee's proposed TS 3.6.I.1 does not include cold shutdown and refueling modes of applicability per the STS.

NYPA Response: Cold shutdown and refueling modes were not included because not all systems are required to be operable in these modes. The Authority will modify the proposed Technical Specifications to require that snubbers be made operable within 72 hours when the plant is in normal operation. When the plant is in cold shutdown or the refueling mode, the proposed Technical Specifications will be modified to require that the snubber(s) be made operable within 7 days whenever the system in which they are installed is required to be operable.

The Authority will delete proposed T.S. 3.6.I.3 and 3.6.I.4 since Limiting Conditions for Operation are contained in T.S. 3.6.I.2.

I.F. NRC Position: The licensee's proposed TS 3.6.I.2 includes an additional LCO provision for an engineering evaluation to declare a system operable with an inoperable snubber(s).

NYPA Response: If one or more snubber(s) are found "inoperable", the inoperable snubber(s) will be replaced or restored to "operable" status within the specified time (72 hours when the plant is in normal operation or 7 days when the plant is in cold shutdown or the refueling mode), otherwise the system will be declared inoperable and the appropriate limiting condition for operation statement for that system will be followed. In lieu of complying with one of the above options, an engineering evaluation may be done to determine if the "inoperable" snubber is necessary for operation of the system and to meet the design criteria of the plant. If the evaluation

determines that the snubber is not required, the snubber would be removed from the system with no resultant impact on safety. For all the options, resolution will be completed within the specified time.

In all cases, as per the proposed TS 4.6.I.5, an engineering evaluation will be done to determine that the supported component or system has not been degraded by the inoperable snubber(s).

I.H. NRC Position: The licensee's proposed TS does not include the STS provision for modifying the table for snubber listed in "High Radiation Zones During Shutdown."

NYPA Response: A statement to this effect will be added to the proposed Technical Specification.

II.B NRC Position: The licensee's proposed TS 4.6.I does not reference the existing inservice inspection surveillance requirement specification.

NYPA Response: The proposed Technical Specification will be revised to incorporate requirements equivalent to STS 4.0.5.

II.D.5 NRC Position: The licensee's proposed TS 4.6.I.2 does not include the provisions for snubber inoperability due to uncovered fluid ports.

NYPA Response: As per discussions with the NRC staff on declaring the snubbers inoperable due to uncovered fluid ports, the proposed Technical Specifications will include provisions for declaring the snubber(s) inoperable due to loss of fluid, if these snubbers are required.

II.D.6 NRC Position: The licensee's proposed TS does not include STS requirement to address common fluid reservoirs for inoperability.

NYPA Response: This item is not applicable because no common fluid reservoirs are used.

E.1 NRC Position: The licensee's proposed TS 4.6.I.3 states "once each refueling cycle." STS requires "once each refueling outage."

NYPA Response: The words "Refueling Cycle" will be replaced by "Operating Cycle" to make it consistent with the other sections of the Technical Specifications. The

Authority considers a test interval of "once each operating cycle" necessary instead of "once each refueling outage", because this would allow us to complete testing over the time period of the entire cycle. The test interval of refueling outage will unnecessarily restrict us to completing all the tests within the limited outage period at the end of the operating cycle.

E.2 NRC Position: The licensee's proposed TS 4.6.I.3 does not include the provision of 10% of "each type" in the test sample.

NYPA Response: The proposed TS will be revised to include the provision of 10% of "each type" in the test sample.

E.6 NRC Position: The licensee's proposed TS does not include the STS provision for snubber exemption.

NYPA Response: The proposed Technical Specification will be revised to include the STS provision for snubber exemption.

E.8 NRC Position: The licensee's proposed TS 4.6.I.5 does not include the provision for all snubbers of the same design to be tested should one fail to lockup or move.

NYPA Response: If any snubber selected for functional testing either fails to lockup or move, the cause will be evaluated. If the cause is found to be generic due to manufacturer defect, design deficiency or any other reason, then all snubbers of the same design will be functionally tested. The proposed Technical Specification will be amended to reflect this. If the cause is determined to be unique to the snubber in question, there is no need to test all other snubbers of the same design.

III.A NRC Position: The licensee's proposed TS 3.6.I and 4.6.I bases are not consistent with the STS bases.

NYPA Response: Based on the above responses, appropriate changes will be made to the bases.