

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES
GENERIC LETTER 88-01 INSERVICE
INSPECTION REQUIREMENTS
JPTS-88-013

New York Power Authority
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333

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3.6 (cont'd)

F. Structural Integrity

The structural integrity of the Reactor Coolant System shall be maintained at the level required by the original acceptance standards throughout the life of the Plant.

G. Jet Pumps

Whenever the reactor is in the startup/hot standby or run modes, all jet pumps shall be operable. If it is determined that a jet pump is inoperable, the reactor shall be placed in a cold condition within 24 hours.

4.6 (cont'd)

F. Structural Integrity

1. Nondestructive inspections shall be performed on the ASME Boiler and Pressure Vessel Code Class 1, 2 and 3 components and supports in accordance with the requirements of the weld and support inservice inspection program. This inservice inspection program is based on an NRC approved edition of, and addenda to, Section XI of the ASME Boiler and Pressure Vessel Code which is in effect 12 months or less prior to the beginning of the inspection interval.
2. An augmented inservice inspection program is required for those high stressed circumferential piping joints in the main steam and feedwater lines larger than 4 inches in diameter, where no restraint against pipe whip is provided. The augmented in-service inspection program shall consist of 100 percent inspection of these welds per inspection interval.
3. An Inservice Inspection Program for piping identified in the NRC Generic Letter 68-01 shall be implemented in accordance with NRC staff positions on schedules, methods, personnel, and sample expansion included in this Generic Letter, or in accordance with alternate measures approved by the NRC staff.

G. Jet Pumps

Whenever there is recirculation flow with the reactor in the startup/hot standby or run modes, jet pump operability shall be checked daily by verifying that the following conditions do not occur simultaneously:

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SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES
GENERIC LETTER 88-01 INSERVICE
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I. DESCRIPTION OF THE PROPOSED CHANGES

This application for an amendment to the James A. FitzPatrick Technical Specifications incorporates a reference to the NRC approved FitzPatrick Inservice Inspection (ISI) program into the Technical Specifications.

This change adds the following statement to Section 4.6.F.3:

An Inservice Inspection Program for piping identified in the NRC Generic Letter 88-01 shall be implemented in accordance with NRC staff positions on schedules, methods, personnel, and sample expansion included in this Generic Letter, or in accordance with alternate measures approved by the NRC staff.

II. PURPOSE OF THE PROPOSED CHANGES

The NRC staff requested that the Authority incorporate a reference to the existing ISI program into the Technical Specifications (Reference 1).

The NRC staff, in Generic Letter 88-01 (Reference 2), requested that licensees add a statement like the one proposed to their Technical Specifications. The proposed statement is similar to the sample statement included in the Generic Letter, except for the phrase which permits the use of alternate techniques if approved by the NRC.

III. EFFECT OF THE PROPOSED CHANGES

This change is administrative in nature because it amends the Technical Specifications by adding a statement which incorporates a reference to the existing NRC approved FitzPatrick ISI program into the Technical Specifications. The conclusions of the FitzPatrick plant's accident analyses as documented in the FSAR or the NRC staff's SER are not altered by this change to the Technical Specifications.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the James A. FitzPatrick Nuclear Power Plant in accordance with this proposed amendment would not involve a significant hazards consideration, as defined in 10 CFR 50.92, since the proposed changes would not:

1. involve a significant increase in the probability or consequence of an accident previously evaluated. This proposed change is purely administrative in nature, since it simply incorporates a reference to the existing ISI program into the Technical Specifications. The existing FitzPatrick ISI program has been extensively reviewed and approved by the NRC staff. This change does not involve a modification of any structures, systems, or components; nor does it alter any plant operating procedure or the ISI program.

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2. create the possibility of a new or different kind of accident from those previously evaluated. The proposed change is purely administrative in nature, since it simply incorporates a reference to the existing ISI program into the Technical Specifications. This change does not involve a modification to any structures, systems, or components. Since the existing ISI program requires no hardware changes, the introduction of new failure modes will not occur. Therefore, this proposed change will not create any new or different kind of accident from those previously evaluated.
3. involve a significant reduction in the margin of safety. The proposed change is purely administrative in nature, since it simply incorporates a reference to the existing ISI program into the Technical Specifications. The existing FitzPatrick ISI program ensures that surveillance is performed on piping susceptible to IGSCC in a manner that increases the probability of detecting any defects or flaws. This change does not involve a modification of any structures, systems, or components; nor does it alter any plant operating procedures or the ISI program.

V. IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of the proposed changes will not impact the ALARA or Fire Protection Programs at the FitzPatrick plant, nor will the changes impact the environment.

VI. CONCLUSION

These changes, as proposed, do not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, they:

- a. will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report;
- b. will not increase the possibility for an accident or malfunction of a different type from any evaluated previously in the safety analysis report;
- c. will not reduce the margin of safety as defined in the basis for any technical specification; and
- d. involve no significant hazards consideration, as defined in 10 CFR 50.92.

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VII. REFERENCES

1. NRC letter, D.E. LaBarge to J.C. Brons dated May 4, 1990 regarding the response to Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping" (TAC No. 69136).
2. NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping" (TAC No. 69136).