



June 19, 1984  
JPN-84-39

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
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  
NUREG-0737, Item II.K.3.16  
"Reduction of Challenges and Failures  
of Relief Valves - - Feasibility Study  
and System Modification"

References: 1. NRC letter, D. B. Vassallo to  
J.P. Bayne, dated April 3, 1984

Dear Sir:

This letter responds to Reference 1 which requested an update of our previous responses to the subject item.

Reference 1 states that the following modifications are acceptable to reduce safety-relief valve (SRV) challenges and failures:

1. Low-Low Set Relief Logic System or Equivalent Manual Actions;
2. Lower the reactor pressure vessel water level isolation setpoint for main steam isolation valve closure from Level 2 to Level 1;
3. Increase safety/relief valve simmer margin;
4. Preventative Maintenance Program.

Of the above recommendations, the New York Power Authority (NYPA) has implemented the following:

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Item (1) - Equivalent Manual Actions

Manual operation of the SRVs is described in the Boiling Water Reactor (BWR) Emergency Procedure Guidelines that are being used to develop new EOP's at the FitzPatrick Plant. Manual operation is described in Operating Procedures and Emergency Operating Procedures.

Item (3) - Increase SRV Simmer Margin

Seven of eleven SRVs are currently set above the simmer margin of 120 psi that General Electric recommended in SIL 196, Supplement No. 3.

Item (4) - Preventative Maintenance Program

NYPA is a member of the BWR Owners Group subcommittee on SRV set-point drift. One of the results of the program was a modification of the valve recertification program to include a more detailed inspection of the pilot section. This increased maintenance should insure proper operation during the cycle. Current JAF maintenance procedures and Technical Specifications require 50% inspection at each refueling outage.

Additional actions that NYPA has taken include changing from Target-Rock three stage SRVs to the two stage models on all eleven valves and the installation of an analog trip system for the Emergency Core Cooling System and the Reactor Protection System.

We feel that these steps will adequately reduce challenges and the failures of relief valves and will achieve the objectives of NUREG-0737, Item II.K.3.16.

We, therefore, consider this item to be closed.

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

Very truly yours,

*for* *C. M. Wilverding*  
J. P. Bayne  
Executive Vice President  
Nuclear Generation

cc: Office of the Resident Inspector  
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