



Ralph E. Beedle  
Executive Vice President  
Nuclear Generation

June 22, 1992  
JPN-92-030

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
**Proposed Change to the Technical Specifications  
Instrument Channel Response Time Testing (JPTS-92-010)**

- References:
1. NRC letter, C. W. Hehl to R. J. Converse, dated February 20, 1992, "NRC Region I Inspection No. 50-333/91-22."
  2. NRC letter, C. W. Hehl to R. E. Beedle, dated April 17, 1992, "Enforcement Conference on March 18, 1992 to Discuss Apparent Violations Documented in Inspection Report No. 50-333/91-22."

Dear Sir:

This application for an amendment to the James A. FitzPatrick Technical Specifications proposes to add response time testing requirements for the reactor protection system and main steam isolation valve actuation instrumentation including the analog transmitter trip system (ATTS). These testing requirements are applied to instrument channels for which response time is a significant input to the FSAR transient and accident analyses.

The ATTS system was installed in 1985 to replace the original mechanical sensor switches and relays in the reactor protection, containment isolation, and emergency core cooling systems. The NRC approved installation of this system and its associated surveillance and calibration requirements in Amendment 89 to the Technical Specifications. At that time, the Authority did not propose revising the existing Technical Specification response time testing requirements. Instead, the Authority modified the mechanical sensor switch response time testing procedure to accommodate the new instrumentation.

Response time testing for instrument loops using mechanical sensors began at the output contacts of the sensors. With ATTS, the comparable contacts are located at the output of the ATTS relays rather than at the output of the sensors. Since 1985, response time testing had been conducted beginning from the output of the ATTS relays. Accordingly, the measured response time did not include the response time of the sensor nor the time required for the sensor output signal to be processed by other ATTS components. As cited by the NRC in References 1 and 2, this testing method did not meet the assumptions of General Electric Licensing Topical Report, NEDO-21617-A,

9206290354 920622  
PDR ADDCK 05000333  
P PDR

*Aool*  
*1/1*

"Analog Transmitter/Trip Unit System for Engineered Safeguard Sensor Trip Inputs," which formed the bases for Amendment 89.

The proposed Technical Specification amendment provides response time testing requirements appropriate for instrument channels, including ATTS system components, in accordance with the Standard Technical Specifications. The individual response time acceptance criteria were developed by the General Electric Company to ensure that total instrument loop response times, including the ATTS instrumentation delay, remain within the times assumed in the FitzPatrick transient and accident analyses.

The signed original of the Application for Amendment to Operating License is enclosed for filing. Attachment I to this application contains the proposed changes to the Technical Specifications. Attachments II and III contain the associated Safety Evaluation and a report entitled "ATTS Transmitter Response Time Testing Methodology" which describes and evaluates the proposed response time testing methodology.

A copy of this application and the associated attachments are being provided to the designated New York State official in accordance with 10 CFR 50.91.

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

Very truly yours,



Ralph E. Beedle  
Executive Vice President  
Nuclear Generation

att: as stated

cc: Regional Administrator  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Office of the Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 136  
Lycoming, NY 13093

Mr. R. Plasse  
Project Directorate I-1  
Division of Reactor Projects - I/II  
U.S. Nuclear Regulatory Commission  
Mail Stop 14 B2  
Washington, DC 20555

Ms. Donna Ross  
New York State Energy Office  
2 Empire State Plaza  
16<sup>th</sup> Floor  
Albany, NY 12223