



Corbin A. McNeill
Senior Vice President
Nuclear Generation

February 13, 1985
JPN-85-10

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
Response to Generic Letter 84-24
Equipment Qualification

- References:
1. NRC Generic Letter 84-24, dated December 27, 1985.
 2. PASNY letter, J. P. Bayne to D. B. Vassallo, dated May 20, 1983 (JPN-83-45).
 3. NYPA letter, J. P. Bayne to D. B. Vassallo, dated June 15, 1984 (JPN-84-36).
 4. PASNY letter, J. P. Bayne to T. A. Ippolito, dated September 29, 1981 (JPN-81-78).
 5. NRC letter, D. B. Vassallo to J. P. Bayne, dated April 19, 1983.
 6. NYPA letter, J. P. Bayne to D. B. Vassallo, dated June 6, 1983 (JPN-83-52).
 7. NYPA letter, J. P. Bayne to D. B. Vassallo, dated October 15, 1984 (JPN-84-67).
 8. PASNY letter, J. P. Bayne to R. C. Haynes, dated February 28, 1983 (JPN-83-17).

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Dear Sir:

This letter responds to a requirement in Reference 1 to provide information on the status of compliance with 10 CFR 50.49. An extension to February 13, 1985 in which to respond to the subject generic letter, has been granted verbally by Mr. H. Abelson, the NRC Project Manager for the FitzPatrick Plant.

Reference 1 requires certification that the utility has in place and is implementing an Environmental Qualification (EQ) Program that will satisfy the requirements of 10 CFR 50.49 within the currently approved schedule for the plant without further extension. The methodology used for the identification of equipment within the scope of 10 CFR 50.49 was summarized in Reference 3. The 10 CFR 50.49 schedule required that the EQ effort be completed by the second outage after 3/31/82 or by 3/31/85, whichever is earlier. In Reference 2, the Authority stated that "Qualification efforts.... will be completed by March 31, 1985.... provided circumstances do not arise that would adversely affect this qualification goal". Since the FitzPatrick plant's refueling outage is scheduled to begin February 16, 1985, completion of qualification efforts is rescheduled to the end of the outage. Based on telephone conversations with Mr. Abelson, it is our understanding that because the plant will not be operating during this period, the New York Power Authority (NYPA) need not request an extension.

Reference 1 requires that the plant have at least one path to safe shutdown using fully qualified equipment, or have submitted justification for continued operation (JCO) pending full qualification of any equipment not fully qualified; and that all other equipment within the scope of 50.49 is either fully qualified or a JCO has been submitted pending full qualification. The Authority submitted JCOs for those equipment items requiring corrective action to establish EQ in Reference 4. In Reference 5 we were notified that these JCOs were adequate except those for the junction boxes used to protect terminal blocks and splices. The Authority provided a JCO for this equipment in Reference 6. In that letter, the Authority also updated the status of the JCOs deleting those which were no longer found to be required. Finally, Reference 7 presented an updated list of JCOs.

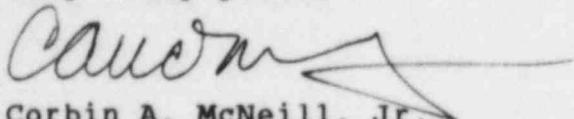
Reference 1 requires that the listed Inspection and Enforcement (IE) Bulletin and Information Notices be addressed for relevance to the FitzPatrick Plant. IE Bulletin 82-04 was addressed in Reference 8 and closed out by NUREG/CR-3795, dated July, 1984.

The IE Information Notices listed in Reference 1 have been addressed and documented. Notices 82-11, 82-52, 83-73, and 84-23 have been closed out. Notices 83-45, 84-44, 84-57, 84-68, and 84-78 will be closed out before start-up.

Regulatory Guide 1.97 has been reviewed, and instruments were identified which were currently installed in the FitzPatrick plant and which meet the required Regulatory Guide 1.97 criteria. If these instruments required EQ (Regulatory Guide 1.97 categories 1 and 2), these instruments and their associated components were included in the 10 CFR 50.49 component listing, and will meet EQ requirements in accordance with the EQ schedule. It should be noted that these certifications do not apply to Regulatory Guide 1.97 equipment that was not listed in Reference 2. The schedule for qualification of this Regulatory Guide 1.97 equipment is not governed by 10 CFR 50.49(g), but rather will be established in the Regulatory Guide 1.97 resolution process.

Should you or your staff have any questions regarding this matter, please contact Mr. J. A. Gray, Jr. of my staff.

Very truly yours,

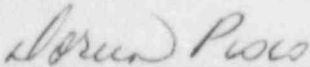


Corbin A. McNeill, Jr.
Senior Vice President
Nuclear Generation

cc: Resident Inspector's Office

State of New York
County of Westchester

Subscribed and sworn to before
me this 13th day of February, 1985.



Notary Public
DOREEN PISCO
Notary Public, State of New York
No. 4737373
Qualified in Westchester County
Term Expires March 30, 1985