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Senior Vice President
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March 4, 1985
JPN-85-16

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
Inservice Inspection Program

Reference: 1. NYPA letter, P.J. Early to T.A. Ippolito,
dated September 10, 1979 (JPN-79-57).

Dear Sir:

This letter discusses the 10 year Inservice Inspection (ISI) interval. The Authority has implemented an ISI program based on the 1974 Edition, Summer 1975 Addenda of Section XI of the ASME Boiler Pressure Vessel Code. This inspection program commenced during the Spring/Summer 1980 refueling outage. Prior to this time, inservice inspections at the James A. FitzPatrick (JAF) plant were performed in accordance with the 1970 Edition of Section XI.

This mid-interval code update resulted in a significant expansion of the requirements for ISI. The 1970 edition had required inspection of only those components which are now considered Class 1, while the newer code expanded the scope of inspection to include Class 2 and Class 3 components. Therefore, while the FitzPatrick initial ten-year interval for Class 1 components will be completed July 28, 1985, the actual interval for the Class 2 and 3 components is at its midpoint.

In order to eliminate the inefficiencies inherent in maintaining what are effectively two separate inspection intervals and programs, and potentially requiring separate updates to different code editions, the Authority plans to

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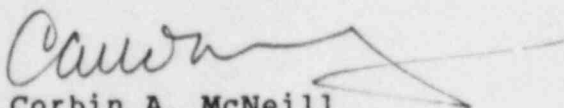
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combine the Class 1, Class 2 and Class 3 components into one inspection program with a common inspection interval. In conjunction with this, the following shall be performed in lieu of completion of the Class 2 and Class 3 interval:

1. Completion of 50% of the required inspections of the Class 2 and 3 components as determined by the current FitzPatrick ISI program during the February 1985 outage. This will result in 50% of the inspections performed in roughly half of a ten-year interval, which meets or exceeds the requirements of IWC-2412 and IWD-2410.
2. Pressure and hydrostatic tests of the Class 2 and 3 components required by IWC-5000 and IWD-5000 for the current interval will be performed during the Reload 7/Cycle 8 refueling outage currently scheduled for the fall of 1986. The additional time is required to prepare test procedures that conform to the requirements of JAF's original construction code, B31.1, 1967 edition.
3. Commencing with the fall 1986 outage, all classes of components will be included in an ISI program based on a single approved edition (and addenda) of Section XI of ASME Code.
4. 100% of the inspections of Class 1 components, as required by Section X of the ASME code and the JAF ISI program, will be completed by the end of the current interval. The inspections for the second ten-year interval will commence during the Fall 1986 outage.

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

Very truly yours,



Corbin A. McNeill
Senior Vice President
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cc: Office of the Resident Inspector