



J. Phillip Bayne  
First Executive Vice President  
Chief Operations Officer

April 26, 1985  
JPN-85-36

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 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  
Proposed Changes to the Technical Specifications  
for Reduction of Emergency Diesel Generator  
Surveillance Tests (PTS-84-23)

Reference: 1. NRC Generic Letter 84-15, "Proposed Staff  
Actions to Improve and Maintain Diesel  
Generator Reliability".  
2. NYPA letter, C. A. McNeill, Jr. to D. G.  
Eisenhut (NRC), dated January 17, 1985 (JPN  
85-04) same subject.

Dear Sir:

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document titled, "Application for Amendment to Operating License", together with forty (40) copies of Attachment I and II thereto, comprising a statement of the proposed changes to the Technical Specifications and the associated Safety Evaluation.

The changes proposed in the attached application satisfy the commitment made by the Authority in Reference 2.

The proposed changes would delete the requirement for demonstrating the operability of the emergency diesel generators, from the Limiting Conditions for Operation (LCO), when the following systems are declared inoperable: Core Spray (CS); Low Pressure Coolant Injection (LPCI) mode of Residual Heat Removal (RHR); and Containment Cooling. This deletion has been proposed, because the LCOs for the emergency diesel generators are specified in Section 3.9.B of the Technical Specifications under Emergency A-C Power

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System, and is in accordance with the Standard Technical Specifications. In addition, Section 3.0.E of the FitzPatrick Technical Specifications requires reactor operation to be governed by the time limits of the Action Statement of the LCO for the emergency power source; and, not by the Action Statement of the individual system that is determined to be inoperable due to the inoperability of its emergency power source.

The proposed changes would also delete the surveillance test requirements for the emergency diesel generators when the above mentioned systems are declared inoperable. Excessive testing of diesel generators has been a cause for concern in the nuclear industry and the NRC staff has concluded that excessive testing of diesel generators results in premature degradation of diesel engines. In Reference 1, the NRC staff recommended that testing of the diesel generators, when emergency core cooling equipment is declared inoperable, be deleted from the Technical Specifications. These changes have been proposed, for the reasons stated above and because of the high reliability of the FitzPatrick diesels. Two of the FitzPatrick diesels have a reliability factor of 1.0 and the other two have a reliability factor of 0.99. These reliability factors have been determined in accordance with Regulatory Guide 1.108 "Periodic Testing of Diesel Generator units used as On-site Electric Power Systems of Nuclear Power Plants".

In the current FitzPatrick Technical Specifications, the diesels are required to be tested every eight hours when reserve power is not available from either one or both off-site sources or when one of the diesel generators is declared inoperable. The proposed amendment would also change this requirement for testing from eight hours to every twenty-four hours in order to reduce the number of tests performed on the emergency diesel generators, because repeated testing does not result in increased reliability but has a detrimental effect. The overall effect of deleting these surveillance tests would be a reduction in the number of diesel tests by approximately 42%. This estimated reduction is based on data from 1981 to 1984. The proposed Amendment also includes administrative changes on pages 115a, 116 and 117 of the Technical Specifications.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated New York State Official.

In accordance with 10 CFR 170.12, a check in the amount of \$150.00 is enclosed as the application fee. The Authority pays this fee under protest pending a final determination of the legality of the fee schedule.

If you have any questions on this application, please contact  
Mr. J. A. Gray, Jr. of my staff.

Very truly yours,



J. P. Bayne  
First Executive Vice President  
Chief Operations Officer

Encs.

cc: Office of the Resident Inspector  
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