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September 25, 1992
JPN-92-C58

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 Changes to the Technical Specifications
Primary Containment Iodine
Monitoring Specifications (JPTS-91-006)

REFERENCE: 1. U.S. NRC Regulatory Guide 1.45, "Reactor Coolant
Pressure Boundary Leakage Detection Systems," dated
May 1973.
2. NUREG-0123, "Standard Technical Specifications for
General Electric Boiling Water Reactors (BWR/5)," Revision
3, dated Fall 1980.

Dear Sir,

This application for an amendment to the James A. FitzPatrick Technical Specifications removes the surveillance requirement for monitoring iodine in the drywell atmosphere from the Continuous Atmosphere Monitoring (CAM) system. This amendment is consistent with NRC staff guidance which only requires monitoring of the particulate portion of the drywell atmosphere in conjunction with sump level/flow monitoring in determining the presence of primary coolant leakage.

The NRC staff's position requiring a third independent monitoring methodology as a supplement for the two requirements specified above, is fulfilled by the monitoring of the gaseous portion of the drywell atmosphere by the CAM system. Monitoring by the CAM system for the presence of iodine is, therefore, unnecessary and excessive. Established industry practice supports this position by not requiring CAM systems to monitor for iodine.

Removing the surveillance requirement for monitoring iodine from the CAM system will not reduce the level of confidence in being able to determine the presence of primary coolant leakage. This capability was part of the original design which was installed prior to the NRC's finalization of CAM system requirements. This proposed amendment removes an

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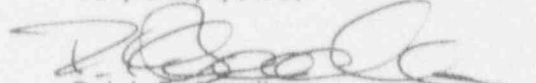
unnecessary operational restriction/requirement. It also simplifies equipment maintenance by not requiring testing, calibration, and repairing of the iodine portion of the CAM system. Finally, future replacement/upgrading of the CAM system will not require the inclusion of an iodine data channel providing an economic benefit.

The signed original of the Application for Amendment to Operating License is enclosed for filing. Attachments I and II to this application contain the proposed changes to the Technical Specifications and the associated Safety Evaluation.

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 J. A. Gray, Jr.

Very truly yours,



Ralph E. Beedle

att: as stated

cc: Regional Administrator
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