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July 2, 1985  
JPN-85-55

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  
Additional Information Regarding Generic Letter 83-28  
"Required Actions Based on Generic Implications of  
Salem ATWS Events."

- Reference:
1. NRC letter, D. B. Vassallo to J. P. Bayne, dated April 23, 1985, same subject.
  2. NRC Generic Letter No. 83-28, D. G. Eisenhut to All Licensees, dated July 8, 1983, same subject.
  3. NYPA letter, J. P. Bayne to D. B. Vassallo, dated June 29, 1984 (JPN-84-42), same subject.

Dear Sir:

Attachment No. 1 to this letter provides the Authority's response to your letter dated April 23, 1985 (Reference 1). That letter requested additional information regarding Generic Letter 83-28 (Reference 2). Attachment No. 1 supplements the information contained in Reference 3 and completes the Authority's response to the following items of Generic Letter No. 83-28:

Item 2.1 (Part 1) - Reactor Trip System equipment classification program.

Item 2.1 (Part 2) - Vendor Interface program for Reactor Trip System components.

Item 2.2.1 - Equipment classification program for all safety-related components.

Item 2.2.2 - Vendor Interface program for all safety-related components.

Item 4.5.2. - On-line functional testing of the Reactor Trip System.

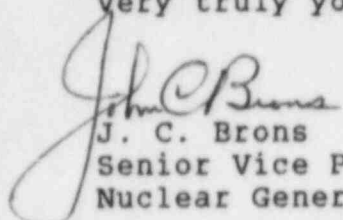
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The Authority's plant specific response to Item 4.5.3 (evaluation of existing intervals for RTS functional testing) will be provided following the issuance of the staff's evaluation of the BWR Owners' Group response.

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

Very truly yours,

  
J. C. Brons  
Senior Vice President  
Nuclear Generation

cc: Office of the Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 136  
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ATTACHMENT 1 TO JPN-85-55

Additional Information Regarding  
Generic Letter 83-28,  
"Required Actions Based on Generic Implications  
of Salem ATWS Events"

New York Power Authority  
James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333

### Item 2.1 (Part 1)

Licensee needs to confirm the review of the RTS classification program is complete and that it verifies that RTS components are classified as safety-related and identified as such on all documentation and in information handling systems.

### Response to Item 2.1 (Part 1)

Review of the Reactor Trip System (RTS) to verify that RTS components are classified as safety related (QA Category 1) is complete. As noted in Reference 3, the Reactor Protection System (RPS) (System 05) is classified as QA Category 1 except for the RPS motor generators. Other systems which have components which form part of the RTS have also been reviewed for verification that the components of concern are classified as QA Category 1. These systems and a general description of the components/component function are listed below:

1. System 02-3, Reactor Vessel Instrumentation
2. System 03, Control Rod Drive Hydraulic System
3. System 07, Neutron Monitoring
4. System 17, Process Radiation Monitoring (Main Steam Line Radiation)
5. System 94, Turbine Generator (Turbine Generator Stop and Control Valve Position)
6. System 29, Main Steam System (Main Steam Isolation Valve Position)
7. System 33, Condensate System (Condenser Vacuum)

Identification of documentation and information handling systems pertaining to safety related activities, such as Work Request/Event/Deficiency (WRED) forms, is controlled by administrative controls. These controls require that each WRED initiated for maintenance activity be reviewed by the plant QA organization to assign (or verify) the proper QA classification prior to the start of the maintenance activity. In a similar manner, administrative controls require the review of modification and procurement documents to verify proper QA classification.

Some documents such as vendor manuals, drawings, elementary diagrams, wiring diagrams, schematics and/or interconnection diagrams may be used by personnel when performing safety related work. While these documents generally are not classified as safety related or QA Category I, the work is administratively controlled by the WRED and associated forms. As noted above, the WRED is reviewed by the QA organization to assure proper classification of the activity of concern.

Administrative controls are also provided for classification of components not previously classified. These controls assure proper classification prior to the start of maintenance work or the installation of modifications, as applicable. A copy of Engineering Design Procedure (EDP) No. 12, entitled "Procedure for Establishing Quality Assurance Category Classification", is included as Attachment No. 2.

#### Item 2.1 (Part 2)

Licensee needs to submit a description of its program to establish and maintain an interface between all vendors of components needed to perform reactor trip and the licensee. Information submitted shall describe how the program assures that vendor technical information is kept current, complete and controlled throughout the plant life; how the division of responsibility between the licensee and vendors who provide test and maintenance services is handled; and verify that lists of vendor technical information and the information itself is available at the reactor site for audit.

#### Response to Item 2.1 (Part 2)

In addition to the formal Operating Experience Review program described in Reference 3, the James A. FitzPatrick Nuclear Power Plant is in the process of establishing a formal vendor technical manual control system. This program is based on INPO Good Practice MA-304, entitled "Control of Vendor Manuals". Implementation of vendor technical manual controls is scheduled for September 30, 1985.

Interface with the Nuclear Steam Supply System vendor (General Electric Company) is maintained through the Operating Experience Review Program and the several communications systems used by General Electric. A description of these component parts of the vendor interface program is contained in Reference 3. Other vendor interface functions are provided by the programs described in the Nuclear Utility Task Action Committee (NUTAC) Report concerning Item 2.2.2 of Generic Letter 83-28. The Authority position concerning the NUTAC program is presented below in response to Item 2.2.2. A copy of the procedure governing Operating Experience Review (Plant Standing Order 28) is included as Attachment No. 3.

Where a division of responsibility between the Authority and vendors exists, the responsibilities and interface requirements are addressed in applicable procurement documentation i.e., the purchase specifications and related documents for contracted services and/or materials impose the requirements of 10 CFR 21, 10 CFR 50, Appendix B and ANSI N45.2-1974 (Quality Assurance Requirements for the Design of Nuclear Power Plants) on the contractors.

#### Item 2.2.1

Licensee needs to provide response to sub-items 5 and 6 to address design verification and qualification testing and to address the classification of equipment important to safety.

#### Response to Item 2.2.1

The Authority's James A. FitzPatrick Nuclear Power Plant administrative controls currently address the requirements of Item 2.2.1.5 of Generic Letter 83-28. These controls require that procurement document technical review address appropriate design verification, qualification testing, and shelf life and safety service conditions and that these requirements be stated in the applicable procurement documents. These controls were recently issued and will be fully implemented by September 30, 1985 following appropriate training of personnel. A copy of engineering Design Procedure 16 entitled, "Procedure for Technical Review of Procurement Documents" is included as Attachment No. 4.

James A. FitzPatrick Nuclear Power Plant administrative controls currently provide detailed procedures for the classification of safety related components which are identified as not properly classified, are purchased as replacement parts or are installed as part of modifications. The controls also address classification of equipment that may be more important than non-safety related (Category M) but does not fall within the definition of QA Category I. A copy of Engineering Design Procedure (EDP) No. 12 entitled, "Procedure for Establishing Quality Assurance Category Classification", is included as Attachment No. 2.

#### Item 2.2.2

Licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at FitzPatrick. This program needs to be supplemented because it fails to address the establishment and maintenance of an interface between the licensee and all vendors of safety-related equipment to assure that vendor technical information is kept current, complete, and is incorporated as appropriate into plant procedures and maintenance instructions. The response should also address concerns about division of responsibility between licensee and its vendors who provide maintenance or testing services to assure that needed control is maintained over procedures and maintenance instructions.

#### Response to Item 2.2.2

The Authority still considers that the Vendor Equipment Technical Information Program (VETIP) as defined in the March, 1984 NUTAC document is a valid response to Item 2.2.2 of the NRC Generic Letter 83-28. The Authority is implementing the program as described therein. Accordingly, it is requested that NRC reanalyze and reconsider the request for additional information.

As noted in response to Item 2.1 (Part 2) above, administrative controls are in place which impose the requirements of 10 CFR 21, 10 CFR 50, Appendix B and ANSI N45.2-1974 on purchased material and services for safety related components.



#### Item 4.5.2

Licensee needs to verify that all components needed to perform reactor trip (RTS components) can be tested on line (backup scram valves excepted). Any generic reviews that are applicable for your plant should be provided for staff review.

#### Response to Item 4.5.2

Review of the Reactor Trip System (RTS) to verify that all components needed to perform reactor scram (trip) can be tested on line has been completed. All of the components except for backup scram valves can be (and are) tested while on line. It should be noted that the on line testing of scram pilot solenoid valves, scram pilot valves and control rod drive hydraulic control units is performed when control rod scram time testing required by Technical Specification is conducted. These tests are performed for each control rod during startup testing following refueling and at 16 week intervals for ten (10) percent of the control rods. Since control rods are actually scrammed, the test can only be performed within certain reactor power limits rather than at any power level at any time.

With respect to testing of backup scram valves, the James A. FitzPatrick Nuclear Power Plant has implemented test of the backup scram valves (while shutdown) once each operating cycle consistent with the proposed testing discussed in Reference 3.



#### Item 4.5.3

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the Technical Specification surveillance requirements. The licensee needs to address this conclusion.

Regarding the scram pilot valves (including all initiating circuitry), the licensee needs to provide the results of a review of existing or proposed intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response shall show how these intervals result in high reactor trip system availability and present proposed Technical Specifications changes for staff review.

The staff has just received the BWR Owners' Group response to Item 4.5.3 (NEDC-30844). If the licensee intends to formally endorse the Owners' Group response, the licensee should delay his plant-specific response to Item 4.5.3 until after the staff completes its review of the Owners' Group response.

#### Response to Item 4.5.3

Since the Authority intends to formally endorse the BWR Owners' Group response to Item 4.5.3 (NEDC-30844 dated January 1985), no plant-specific response to Item 4.5.3 will be provided at this time.