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New York Power Authority

William J. Cahill, Jr.
Chief Nuclear Officer

October 10, 1996
JPN-96-041

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
Change to Commitment Made in Response to Generic Letter 88-14

REFERENCES:

1. JPN-89-061, "Response to NRC Generic Letter 88-14, Instrument Air Supply Problems Affecting Safety-Related Equipment," dated September 21, 1989.
2. Generic Letter 88-14, "Instrument Air Supply System Problems Affecting Safety-Related Equipment," dated August 8, 1988.
3. ISA-S7.3-1975 (R 1981), "Quality Standard for Instrument Air," approved November 16, 1981.
4. ISA-S7.0.01-1996, "Quality Standard for Instrument Air," approved June 5, 1996.
5. NUREG-1275, "Operating Experience Feedback Report - Air Systems Problems," Volume 2, Published December 1987.

Dear Sir:

The Authority is revising the following commitment made in response (Reference 1) to Generic Letter (GL) 88-14 (Reference 2) regarding the maximum particle size specified in ISA-7.3-1975 (Reference 3) for the Instrument Air System (IAS) at FitzPatrick:

"The FitzPatrick plant will comply with the 3 micron limit as specified in ANSI/IAS Standard 7.3."

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with the following two commitments:

1. *"The FitzPatrick plant will comply with the 40 micron limit as specified in ISA-S7.0.01-1996. Pneumatic devices that require instrument air with less than 40 micron particle sizes shall have additional filtration to meet the particle size limit for the device."*

2. *"If the air system quality does not meet the pneumatic equipment manufacturer's requirements during testing, corrective action will be taken to restore air quality to assure that those requirements are met."*

Commitment 1 meets the particle size limit of ISA-S7.0.01-1996 (Reference 4). Commitment 2 utilizes the guidance contained in NUREG-1275 (Reference 5).

Recommendation 1 of Reference 5 states, in parts, that:

"Licensees should verify (and periodically monitor) that their plants' air system quality is within the specifications of the manufacturers of all pneumatic equipment that is either safety-related or relied upon to perform a safety function..."

"If the air system quality does not meet the pneumatic equipment manufacturer's requirements, either the air system should be modified to assure that those requirements are met, or the pneumatic equipment should be replaced with equipment that can perform the required function with the existing air system."

FitzPatrick periodically tests the plant's air quality. Recent test results show particle sizes of approximately five microns, which is in excess of the three micron limit. However, these test results verify that the manufacturer's recommendations for IAS particle size for all safety-related or important to safety pneumatic devices are being met. These test results also show IAS particle sizes less than the 40 micron limit specified in ISA-S7.0.01-1996. Therefore, there is no need to modify the air system or replace equipment. The revised commitments conform to current industry standards, and satisfy the particle size requirements for safety-related pneumatic equipment.

Attachment 1 contains the commitments made by the Authority in this letter. If you have any questions, please contact Mr. A. Zaremba.

William J. Cahill, Jr.
Chief Nuclear Officer

Attachment: As stated

cc: next page

cc: Regional Administrator
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Attachment 1 to JPN-96-041

Summary of Commitments

Number	Commitment	Due Date
JPN-96-041-01	The FitzPatrick plant will comply with the 40 micron limit as specified in ISA-S7.0.01-1996. Pneumatic devices that require instrument air with less than 40 micron particle sizes shall have additional filtration to meet the particle size limit for the device.	Effective as of the date of this submittal.
JPN-96-041-02	If the air system quality does not meet the pneumatic equipment manufacturer's requirements during testing, corrective action will be taken to restore air quality to assure that those requirements are met.	Effective as of the date of this submittal.