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July 10, 1985  
JPN-85-56

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  
Proposed Changes to the Bases Section of the  
Technical Specifications regarding Reactor  
Building Closed Loop Cooling Water (RBCLCW)  
System Containment Isolation Valves

Reference: 1. NYPA letter, J. P. Bayne to D. B. Vassallo,  
dated November 10, 1983 (JPN-83-94).

Dear Sir:

The Authority submitted the proposed Technical Specification changes regarding the RBCLCW System Containment Isolation Valves via Reference 1.

The proposed changes to the Bases Section of the Technical Specifications were not included in Reference 1 and are enclosed with this letter.

The Safety Evaluation (Reference 1), has a very minor change in the text for the "Description of the Changes." This change pertains to the page numbers covering the Bases Section. The revised page for the Safety Evaluation is enclosed with this letter.

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

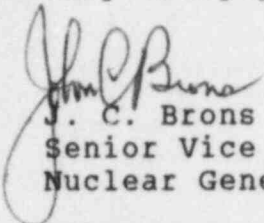
The Authority has paid \$4,000 as the filing fee for this Application for Amendment (Reference 1) in accordance with 10 CFR 170.22.

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

Very truly yours,



J. C. Brons  
Senior Vice President  
Nuclear Generation

Enclosure

cc: Office of the Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 136  
Lycoming, New York 13093

Mr. J. D. Dunkleberger  
Division of Policy Analysis and Planning  
New York State Energy Office  
Agency Building 2, Empire State Plaza  
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## 3.7 BASES (cont'd)

of the containment. Closure of one of the valves in each line would be sufficient to maintain the integrity of the Pressure Suppression System. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss-of-coolant accident.

Nine remote manually operated isolation valves have been added to the Reactor Closed Loop Cooling Water System (RBCLCWS) in order to comply with 10 CFR 50 Appendix A GDC 57. These valves are air operated (with solenoid pilot valves), normally open, and are designed to fail 'open' on loss of electrical power or "as is" upon loss of instrument air. Each AOV is provided with a Seismic Class I accumulator tank to allow operation of the valves upon loss of instrument air up to 2 full cycles. The RBCLCWS is an essential system and performs a post-accident safety function. The fail-open design permits continued operation of the system to supply water to the drywell recirculation pump-motor coolers and drywell coolers during normal operation and as necessary under accident conditions. The RBCLCWS lines are part of a closed system, as defined in GDC 57, and do not communicate with either the primary system or the containment. Since the piping itself comprises an isolation boundary, the single isolation valve need not be closed if it should become inoperable. If there is a postulated accident, and indications of leakage from RBCLCWS, the operator will selectively close the AOV's affected to provide containment isolation.

## 4.7 BASES (cont'd)

operability results in a more reliable system.

The main steam line isolation valves are functionally tested on a more frequent interval to establish a high degree of reliability.

The primary containment is penetrated by several small diameter instrument lines connected to the reactor coolant system. Each instrument line contains a 0.25 in. restricting orifice inside the primary containment and an excess flow check valve outside the primary containment.

The RBCLCWS valves are excluded from the quarterly surveillance requirements because closure of these valves will eliminate the coolant flow to the drywell air and recirculation pump-motor coolers. Without cooling water, the drywell air and equipment temperature will increase and may cause damage to the equipment during normal plant operations. Therefore, testing of these valves would be conducted once per operating cycle.

SAFETY EVALUATION RELATED TO REACTOR CLOSED LOOP COOLING WATER  
(RBCLCW) SYSTEM CONTAINMENT ISOLATION VALVES (REFERENCE 1)

I. Description of the Changes

The proposed changes to the FitzPatrick Technical Specifications reflect the installation of the new containment isolation valves in the RBCLCW System and exclusion of these valves from quarterly surveillance requirements.

Specifically, nine (9) remote manually operated containment isolation valves were added to the RBCLCWS piping in order to comply with 10 CFR 50 Appendix A GDC 57. These valves are air operated (with solenoid pilot valves). These valves are normally open, and are designed to fail open on loss of electrical power, and to fail as is on loss of air supply.

As a result of this modification, the following Technical Specifications changes are being proposed.

1. In section 4.7.D.1.c.(1) on page 185, the phrase "and RBCLCW System" is inserted.
2. Section 4.7.D.1.e is inserted on page 186 to read, "The RBCLCW System isolation valves shall be fully closed and reopened once per operating cycle." In section 3.7.D.2 on that page, the phrase "Except the RBCLCW System Isolation Valves)" is inserted.
3. Bases for the RBCLCW System isolation valves have been added to Section 3.7.D page 192 and Section 4.7.D page 197.
4. In Table 3.7-1 on page 204, for the Reactor Building Closed Loop Cooling Water In and Out lines, Valve Type is changed to AO globe, Power to Open is changed to Air/DC; Isolation Signal is changed to RM; and under "Remarks" the following item is inserted: "The RBCLCW isolation valves remain in their last position on loss of air supply and open on loss of electrical power."
5. Note 6 on page 208 is revised to read. "All motor-operated isolation valves remain in the last position upon failure of valve power. All air-operated valves, except RBCLCW containment isolation valves, close on motive air failure. All air-operated valves except main steam isolation valves and RBCLCW containment isolation valves, close on power failure to the solenoid pilots.

II. Purpose of the Changes

The nine (9) remote manual containment isolation valves were added to the RBCLCWS piping in order to comply with 10 CFR 50 Appendix A GDC 57 and to bring the plant into conformance with the FSAR.