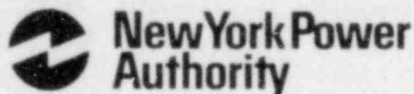


James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315 342.3840



Radford J. Converse
Resident Manager

March 27, 1986
JAFP-86-0266

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Samuel J. Collins, Chief
Project Branch No. 2
Division of Reactor Projects

Subject: James A. FitzPatrick Nuclear Power Plant Docket No. 50-333
Inspection No. 85-31

Gentlemen:

In accordance with the provisions of 10CFR2 Appendix C, we are submitting our response to Appendix A Notice Of Violation transmitted by your letter dated February 27, 1986, as received by the undersigned March 3, 1986. This refers to the inspection conducted by Mr. A. Luptak of your office on December 1, 1985 to January 17, 1986 at the James A. FitzPatrick Nuclear Power Plant.

RESPONSE TO NOTICE OF VIOLATION

The Power Authority agrees with this finding:

The fundamental cause of these two incidents was the failure of staff personnel to recognize the events as requiring immediate NRC notification under 10CFR50.72. The events were however correctly recognized as reportable under the Licensee Event Report system (10CFR50.73) and were reported as Licensee Event Reports 85-025-00 and 85-020-01.

Work Activity Control Procedure WACP-10.1.1 ("Procedure for Control of Maintenance") contains procedures for initiating and tracking reportable occurrences. WACP-10.1.1 in turn refers to Administrative Procedure AP-8.2 ("Reporting Variations From Normal Plant Operations and 10CFR21 Requirements") for criteria to determine if an event is reportable. Administrative Procedure 8.2 does not include the reporting requirements of 10CFR50.72 it primarily addresses the Licensee Event Report system and reporting defects or failures to comply.

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TO: United States Nuclear Regulatory Commission
ATTENTION: Samuel J. Collins, Chief
SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT DOCKET NO.
50-333 INSPECTION NO. 85-31

March 27, 1986
JAFP-86-0266
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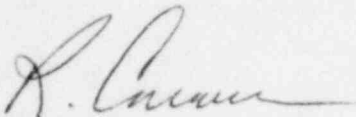
Immediate NRC notification is included in Operations Department Standing Order 8 ("Procedure for Operation and Testing of the Emergency Notification System (ENS) (Red Phone)) which describes the operation of the Emergency Notification System. Standing Order 8 summarizes the requirements of 10CFR50.72 and contains procedures for immediate notification. WACP-10.1.1 does not direct shift personnel to review Standing Order 8 to determine if the event is immediately reportable under 10CFR50.72.

Immediate Corrective Action:

The immediate corrective action consisted of counseling all Operations Department personnel on Operations Department Standing Order 8 and on the requirements of 10CFR50.72. This was done during a weekly Operations Department meeting and by the Night Order Book.

Permanent Corrective Action:

The permanent corrective action shall be a change to those procedures which govern report of variations from normal plant operations. These changes shall consolidate the requirements of 10CFR50.72 and 50.73 into one procedure and provide a clear check-off list for shift personnel to ensure review of these requirements when classifying reportable events. These changes will be completed by July, 1986. The time is required due to the number of present procedures which require change, including a major revision to WACP-10.1.1 which is already in progress. In general, requirements of 10CFR50 are included in the Licensed Operator Requalification Program. The lesson plans will be revised to include specific training on 10CFR50.72 and the procedure changes associated with the requirements of 50.72 and 50.73. Training on the procedure changes will be completed by September, 1986.



RADFORD J. CONVERSE

RJC:DJL:dmh

CC: RMS for Headquarters Distribution/WPO, W. Fernandez/JAF, R. L. Patch/JAF,
D. J. Lindsey/JAF, NRC Resident Inspector/JAF, NRCI-85-28 File, Document
Control Center

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