123 Main Street White Plains, New York 10601 914 681 6209



April 29, 1994 JPN-94-022

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U.S. Nuclear Regulatory Commission Mail Station P1-137 Washington, D.C. 20555

ATTN: Document Control Desk

SUBJECT: James A. FitzPatrick Nuclear Power Plant Docket No. 50-333 Proposed Change to the Technical Specification Bases Regarding the Design Basis of the Emergency Service Water System

REFERENCES: 1. JAF-SE-90-067, Rev. 4 dated May 5, 1993, "Clarification of Design Basis Requirements for the JAFNPP Emergency Service Water System (46)."

> NRC letter, M.W. Hodges to H.P. Salmon, dated June 11, 1992, "NRC Inspection Report 50-333/92-81."

Dear Sir:

This letter proposes a change to the James A. FitzPatrick Technical Specifications Bases Section 3.11.D, "Emergency Service Water System." The change to the Technical Specification Bases reflects the information provided in the Updated Final Safety Analysis Report (UFSAR). Attachments I and II of this application contain the proposed change to the Technical Specification Bases, and a markup of the current Technical Specification Bases, respectively.

The proposed change removes the reference to "ECCS Pumps" in Technical Specification Bases Section 3.11.D on page 243. This change will update the Bases of the Emergency Service Water (ESW) System to be consistent with the analysis performed in safety evaluation JAF-SE-90-067 (Reference 1). In this safety evaluation, the Residual Heat Removal (RHR) pump seal water coolers have been re-classified as non-safety related. As a result, these coolers were isolated from ESW in part to provide additional ESW water flow to other components. The safety evaluation documented that the RHR System would be able to perform its intended safety function with ESW isolated. This conclusion is also supported by vendor documentation which states that the isolation of the ESW System would not inhibit RHR pump operation during accident conditions. Therefore, the Authority proposes to revise the Technical Specification Bases section 3.11.D to reflect that the RHR pumps seal coolers are no longer a safety-related load on the ESW System. This change will revise the Bases by removing the reference to "ECCS Pumps" in Technical Specification Bases Section 3.11.D. This change is consistent with

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the recommendation made in NRC Inspection Report 50-333/92-81 (Reference 2).

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

Very truly yours,

W. A. Josiger Acting Executive Vice President Nuclear/Generation

cc: Regional Administrator U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

> Office of the Resident Inspector U.S. Nuclear Regulatory Commission P.O. Box 136 Lycoming, NY 13093

> Mr. Brian C. McCabe Project Directorate I-1 Division of Reactor Projects - I/II U.S. Nuclear Regulatory Commission Mail Stop 14 B2 Washington, DC 20555

Ms. Donna Ross New York State Energy Office 2 Empire State Plaza 16th Floor Albany, NY 12223