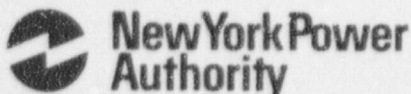


James A. FitzPatrick  
Nuclear Power Plant  
268 Lake Road  
P.O. Box 41  
Lycoming, New York 13093  
315-342-3840



Michael J. Colomb  
Site Executive Officer

July 14, 1999  
JAFP-99-0208

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555-0001

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
License No. DPR-59  
**Clarification of Information Regarding Proposed Improved Technical Specifications**

References:

1. NRC Summary of April 14, 1999, Meeting Regarding Proposed Improved Technical Specifications (TAC NO. MA5049)(dated May 4, 1999)
2. NYPA letter JPN-99-018 (dated June 1, 1999) Concerning Revision to Proposed Technical Specification Changes Regarding Conversion to Improved Standard Technical Specifications

Dear Sir:

This letter and the associated attachment is provided to reconcile differences in information contained in attachments to References 1 and 2.

On April 14, 1999, New York Power Authority (NYPA) personnel met with Nuclear Regulatory Commission (NRC) Staff personnel to discuss proposed improved Technical Specifications (ITS) for the FitzPatrick plant which were submitted to the NRC on March 31, 1999. As part of the meeting to discuss the proposed ITS, NYPA provided a list of ITS items which were then considered to be beyond the current Technical Specifications and outside the standard ITS. These changes, which are commonly referred to as "beyond-beyond" (or "beyond-scope") changes, were discussed and a copy of the beyond-beyond handout provided by NYPA was subsequently included as an enclosure to the NRC summary of the April 14, 1999, meeting (Reference 1).

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United States Nuclear Regulatory Commission

Attn: Document Control Desk

Subject: Clarification of Information Regarding Proposed Improved Technical Specifications

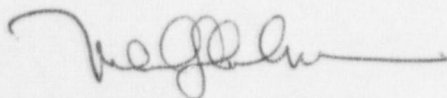
Page -2-

During the April 14, 1999, meeting it was noted that some additional information regarding the beyond-beyond changes should be provided to the NRC to facilitate review of the proposed ITS. NYPA verbally committed to provide the additional information and included the information in Attachment 2 to the June 1, 1999 letter (Reference 2) in the form of a revision of the beyond-beyond handout provided at the April 14 meeting and as enclosed with the May 4, 1999 NRC meeting summary. The additional information provided in the attachment revised, supplemented, or deleted information contained in the handout originally provided at the April 14 meeting without providing an explanation of the differences.

The attachment to this letter provides an explanation (reconciliation) of the differences between the contents of the attachments to References 1 and 2 and also provides information on two additional topics which are not addressed in Reference 1 or 2, but have been discussed during telephone conversations between NRC and NYPA personnel. These additional topics have been addressed in the attachment because they could be considered by some personnel to be changes that are beyond simple conversion to ITS. These additional topics concern the use of "Allowable Values" (AVs) in ITS (in place of "nominal trip setpoints" (NTSPs) in the CTS) and changes to the ITS Required Actions associated with inoperable excess flow check valves (EFCVs) on instrumentation sensing lines.

If you have questions concerning this matter please contact Mr. G. Tasick at (315) 349-6572.

Very Truly Yours,



Michael J. Colomb  
Site Executive Officer

MJC:VC:las  
Attachment

Cc: Next page

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  
James A. FitzPatrick Nuclear Power Plant  
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Mr. G. Vissing, Project Manager  
Project Directorate I  
Division of Licensing Project Management  
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Washington, DC 20555

**Attachment 1**  
**Page 1 of 4**

The table below contains each of the items identified in the enclosure to the May 4, 1999, NRC summary of the April 14, 1999 meeting (first column), the items identified in Attachment 2 to the June 1, 1999, NYPA letter (second column), and remarks to reconcile the differences in the first and second columns are in the third column.

The last two items in the table provide information or clarification concerning topics (which could be considered by some personnel to be beyond the scope of a simple conversion to ITS) that were not addressed in either the May 4, 1999, NRC summary of the April 14, 1999, meeting or the June 1, 1999, NYPA letter.

<u>Items in 4/14/99 NRC Meeting Summary</u>	<u>Items in 6/1/99 NYPA Letter Attachment</u>	<u>Remarks</u>
3.0.3, JFD X2	3.0.3, JFD X2	Minor changes to text. Text provided in Attachment 2 to the 6/1/99 NYPA letter should be used. 3.3.1.1, CLB11 addresses same topic.
3.3.1.1, L9	3.3.1.1, L9	None
(None)	3.3.1.1, CLB11	Same topic as 3.0.3, JFD X2 (this item is actually an example of "other specifications" referred to in 3.0.3, JFD X2 of the May 4, 1999, NRC meeting summary enclosure).
3.3.5.1, L1	3.3.5.1, L1 and L5	Changes to text to make it clear that the ADS timer is also addressed. Added reference to L5 for clarification. Changes addressed in L1 and L5 should be reviewed together as the L1 changes support the L5 changes.
(None)	3.3.5.1, L5	This item added in the June 1, 1999, NYPA letter, attachment 2. The item should be reviewed along with 3.3.5.1, L1 as the timer AVs and tolerances have been changed (L1) to allow the CALIBRATION to be extended to 24 months (L5).
3.4.9, L2	3.4.9, L2	None

Attachment 1  
Page 2 of 4

Items in 4/14/99 <u>NRC Meeting Summary</u>	Items in 6/1/99 <u>NYPA Letter Attachment</u>	<u>Remarks</u>
3.5.1, L7	3.5.1, L7	Changes made to text to make it clear that only HPCI and LPCI flows are being changed. Editorial errors referred to in the May 4, 1999, NRC meeting summary enclosure were determined to be a typographic error that was corrected in the June 1, 1999, NYPA letter Attachment 2 and Revision B to the ITS submittal. Text provided in in June 1 letter attachment should be used. In addition, this item is the same topic as 3.5.2, L5 and both should be reviewed together.
3.5.2, L5	3.5.2, L5	Changed text to make clear that only LPCI flow change is being addressed. This item and 3.5.1, L7 address the same topic and should be reviewed together.
3.6.1.9, L5	3.6.1.9, L5	Changes to text made to provide concise examples of consistent Completion Times as verbally requested by NRC at the April 14, 1999, meeting. This item addresses the same topic as 3.6.2.3, L4 and both should be reviewed together.
3.6.2.3, L4	3.6.2.3, L4	Changes to text made to provide concise examples of consistent Completion Times as verbally requested by NRC at April 14, 1999, meeting. This item addresses the same topic as 3.6.1.9, L5 and both should be reviewed together.

## Attachment 1

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<u>Items in 4/14/99 NRC Meeting Summary</u>	<u>Items in 6/1/99 NYPA Letter Attachment</u>	<u>Remarks</u>
3.8.1, M5 and JFD CLB6	3.8.1, M5 and JFD CLB6	The "12" hours in the second line of the text should be changed to "36" hours as indicated by the hand written markup on the text of the enclosure to the NRC summary of the April 14, 1999 meeting.
3.8.4, L2	(None)	Item deleted from the June 1, 1999, NYPA letter Attachment 2, because the same topic is addressed in TSTF Generic Change Traveler 202. Since TSTF-202 addresses the same topic this change is not considered to be a "beyond-beyond" or "beyond-scope" change.
3.8.4, L4	3.8.4, M2 and L4	Added reference to M2 and made minor changes to the text for clarity.
3.8.6, L1	(None)	Item deleted from the June 1, 1999, NYPA letter Attachment 2, because the same topic is addressed in TSTF Generic Change Traveler 202. Since TSTF-202 addresses the same topic this change is not considered to be a "beyond-beyond" or "beyond-scope" change.
5.5, L2	5.5, L2	Made minor changes to the text for clarity.

Items in 4/14/99 NRC Meeting Summary	Items in 6/1/99 NYPA Letter Attachment	Remarks
RETS Relocation	(None)	Item deleted from the June 1, 1999, NYPA letter Attachment 2. RETS Specifications were evaluated against the 10 CFR 50.36 screening criteria. Only those RETS specifications concerning Primary Containment and Secondary Containment isolation functions met one or more of the 50.36 criteria and those were retained in ITS.
(None)	(None)	Allowable Values (AVs) are used in ITS in place of nominal trip setpoints (NTSPs) which are used in CTS. The proposed change from NTSPs (used in CTS) to AVs (used in ITS) are discussed the following ITS: 3.3.1.1, A19; 3.3.2.2, A6; 3.3.4.1, A7; 3.3.5.1, A12; 3.3.5.2, A9; 3.3.6.1, A16; 3.3.6.2, A12; 3.3.7.1, A2; 3.3.7.2, A14; 3.3.8.1, L1; 3.3.8.2, A3
(None)	(None)	ITS 3.6.1.3 reflects changes to the Required Actions in NUREG-1433, Revision 1, for excess flow check valve (EFCV) inoperability. NUREG-1433, Required Action C.1 addresses inoperable EFCVs and has a 12 hour Completion Time. NYPA proposed to address inoperable EFCVs under ITS 3.6.1.3, Required Action A.1 and to maintain the Completion Time at 12 hours (consistent with the 12 hours in NUREG-1433, Required Action C.1). This change is discussed in ITS 3.6.1.3, NUREG markup JFD DB2.