



February 7, 2003

L-2003-028  
10 CFR 50.4

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Annual Summary of Commitment Changes Implemented  
Without Prior NRC Notification for Calendar Year 2002

Pursuant to the guidance of NRC Regulatory Issue Summary (RIS) 2000-17, *Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff* and NRC endorsed Nuclear Energy Institute (NEI) 99-04, *Guidelines for Managing NRC Commitment Changes*, attached is a summary of commitment changes that were implemented without prior NRC notification during calendar year 2002.

Please contact us if there are any questions regarding this submittal.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. Jernigan', is written over the 'Very truly yours,' text.

Donald E. Jernigan  
Vice President  
St. Lucie Plant

DEJ/spt

Attachment

A001

Annual Summary of Commitment Changes Implemented Without Prior NRC Notification for Calendar Year 2002		
Source	Brief Commitment Summary	Change Summary & Bases for the Change
NRC Inspection Report 97-14 and FPL Letter L-98-039	Management expectations concerning FPL oversight of contractors will be reinforced during site wide pre-outage stand down meetings. Field coverage of contractors and adherence to FPL procedures by contractors will be one of the topics covered in these meetings.	FPL has determined that the existing controls are acceptable, have been institutionalized in plant procedures, and that the reinforcement of these exceptions is no longer required in the pre-outage meetings.
NRC Inspection Report 98-11 and FPL Letter L-99-028	Future pre-outage Employee Communications Meetings will reemphasize management exceptions concerning the need to thoroughly investigate outage discovery items, including the consideration of generic implications as part of the corrective action plan.	FPL will no longer, specifically, include this topic in pre-outage employee meetings. The topics selected for the pre-outage meetings will be from contemporaneous issues and management focus items. This topic could be included if management determines reinforcement is necessary.
NRC Inspection Report 97-13 and FPL Letter L-98-006	HP will continue the practice of having an individual stationed at the containment entrance to ensure personnel are knowledgeable of applicable limits and margins, until such time that access monitoring is on longer needed.	FPL does not consider this good practice necessary to minimize recurrence of this violation. For future outages, FPL will incorporate the good practice into HPP-23, <i>Activities in the Reactor Containment Building During Shutdown</i> , as a management option.

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Annual Summary of Commitment Changes Implemented Without Prior NRC Notification for Calendar Year 2002		
Source	Brief Commitment Summary	Change Summary & Bases for the Change
NRC Generic Letter 96-04 and FPL Letter L-96-260	If silica levels on Unit 1 spent fuel pool exceed 20 ppm, impact will be evaluated.	If silica levels on Unit 1 spent fuel pool exceeds 100 ppm, impact will be evaluated. Fuels evaluated boroflex degradation and corresponding silica level increases per Condition Report 02-0030, which concluded that up to 100 ppm silica is acceptable, but greater than 100 ppm silica needs further evaluation.