



September 1, 2005

L-2005-121  
10 CFR 50.90

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

RE: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Proposed License Amendments  
Elimination of Monthly Operating and Occupational Radiation  
Exposure Technical Specification Reporting Requirements

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specification (TS) revisions. The proposed amendments would eliminate the Monthly Operating Report (MOR) and Occupational Radiation Exposure Report from the TSs. These proposed amendments are justified by TSTF 369, Revision 1, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," and Federal Register Notice 69 FR 35067.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachment 3 contains the affected Technical Specifications pages marked-up to show the proposed changes. Attachment 4 contains the word-processed TS changes.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed amendments. In accordance with 10 CFR 50.91(b)(1), copies of the proposed amendments are being forwarded to the State Designee for the State of Florida.

As part of this license amendment request, FPL commits to provide the NRC the operating data required by Generic Letter 97-02, "Revised Content of the Monthly Operating Report," each calendar quarter by use of an industry database (i.e., the Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations).

St. Lucie requests that the amendment be effective upon NRC approval, with implementation within 60 days of approval by the NRC.

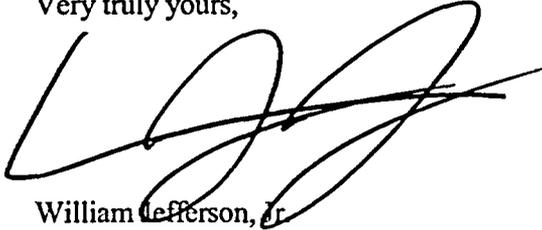
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Please contact us if there are any questions about this submittal.

Very truly yours,

A handwritten signature in black ink, appearing to read 'WJ/KWF', written over a horizontal line.

William Jefferson, Jr.  
Vice President  
St. Lucie Plant

WJ/KWF

Attachments

cc: Mr. W. A. Passetti, Florida Department of Health

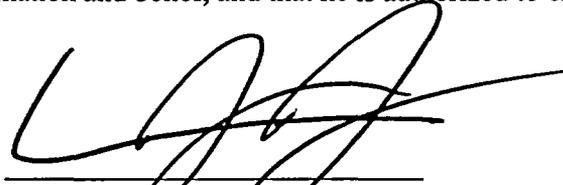
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STATE OF FLORIDA     )  
                                  )     ss.  
COUNTY OF ST. LUCIE    )

William Jefferson, Jr., being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power and Light Company, the Licensee herein;

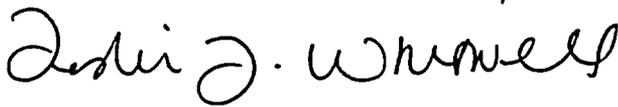
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

  
\_\_\_\_\_  
William Jefferson, Jr.

STATE OF FLORIDA  
COUNTY OF St. Lucie

Sworn to and subscribed before me  
this 1<sup>st</sup> day of Sept., 2005

by William Jefferson, Jr., who is personally known to me.

  
Signature of Notary Public-State of Florida

Name of Notary Public (Print, Type, or Stamp)

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Attachment 1  
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## EVALUATION OF PROPOSED TS CHANGES

## EVALUATION OF PROPOSED TS CHANGES

### INTRODUCTION

Florida Power and Light Company (FPL) proposes to eliminate the Monthly Operating Report (MOR) and Occupational Radiation Exposure Report (ORER) from the TSs. These proposed amendments are justified by TSTF 369, Revision 1, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," and Federal Register Notice 69 FR 35067.

Technical Specification (TS) Section 6.9.1.6, "Monthly Operating Reports," currently requires that a report of plant operating statistics and shutdown experience be submitted each month. This Licensee Action Request (LAR) eliminates the TS requirement based on a commitment to report the information through the industry database.

TS 6.9.1.5, Annual Reports, includes that the ORER be submitted of the number of station, utility, and other personnel for whom radiation exposure monitoring was performed according to work and job function. This LAR eliminates this annual reporting requirement.

These changes are based on Technical Specification Task Force (TSTF) Improved Standard Technical Specifications Change Traveler 369, Revision 1, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," with allowances for the St. Lucie custom TSs.

The proposed changes are described below in more detail.

### BACKGROUND

#### MOR

TSs have historically included a requirement for the submittal of a MOR originally based on Draft Regulatory Guide 1.16, Revision 4, "Reporting of Operating Information - Appendix A TSs." About one third of the nuclear plants use a reporting format based on this regulatory guide for their MOR submittals. Generic Letter (GL) 97-02, "Revised Contents of the Monthly Operating Report," May 15, 1997, was subsequently issued and notified licensees that the scope of the information required by the MOR TS could be reduced and provided a reporting template, which required reporting of several specific power generation statistics and a description of plant shutdown history for the month. The majority of plants currently use the GL 97-02 recommended scope and basic format in preparing MORs.

The industry estimates the cost associated with preparing these monthly submittals for the 104 nuclear plants is approximately 1 million dollars per year. The most recent (FY2000) Office of Management and Budget (OMB) clearance for 10 CFR Part 50 reporting requirements (No. 3150-0011) estimated that the net impact on the annualized cost to NRC attributed to reviewing and

processing MORs was 9984 hours per year, which is approximately 1.4 million dollars per year using the FY 2000 NRC \$141/hour rate.

To reduce administrative burdens and costs of submitting MORs, the TSTF committee proposed an alternative approach to allow electronic reporting of MOR data via an industry database in lieu of the MOR letter report submittals currently being used. This alternate reporting process would provide burden reduction and associated cost savings without an adverse impact on reactor safety or plant operation, and is consistent with NRC initiatives and policy statements (References 1 and 2) on reducing administrative burdens for licensees.

#### ORER

STS 6.9.1.5, ORER, requires an annual report be submitted tabulating the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the reporting requirements of 10 CFR 20.2206.

The NRC staff has undertaken a Reducing Unnecessary Burden Initiative (RUBI). A workshop was held on May 21, 2001, at which the NRC performance goal to reduce unnecessary regulatory burden on stakeholders was discussed, which included a solicitation of suggestions from the industry of candidate reporting requirement reductions. In a letter (Reference 3) dated July 2, 2001, NEI provided NRC a consolidated industry list of potential burden reduction items. NRC subsequently documented its plans for the RUBI in SECY-02-0081, "Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees," dated May 13, 2002 (Reference 1) and the Commission provided further direction on burden reduction initiatives to the NRC staff in a staff requirements memorandum dated June 25, 2002 (Reference 2).

In the course of the above interactions, the ORER was identified as a viable TS reporting requirement candidate for elimination and is currently being carried as an RUBI action as listed in the attachment to the letter from NRC to NEI, dated November 24, 2003 (Reference 4), which summarizes the current NEI License Action Task Force (LATF) and RUBI activities. Since the ORER reporting requirement is in the TSs, the TSTF committee was chartered to propose a generic change to the Standard TS to eliminate the requirement. The proposed reduction in reporting requirements provides an administrative burden reduction and associated cost savings without an adverse impact on reactor safety or plant operation.

#### DESCRIPTION OF PROPOSED CHANGES

Marked-up pages of the proposed St. Lucie Unit 1 and Unit 2 TS changes are shown in Attachment 3. The descriptions of the proposed changes are summarized below:

TS 6.9.1.6, Monthly Operating Report, is deleted based on a licensee commitment to report the same operating data using an industry database.

The Occupational Radiation Exposure Report portion of TS 6.9.1.5 is deleted.

### **JUSTIFICATION OF THE PROPOSED CHANGE**

#### **MOR**

The GL 97-02 MOR dataset includes the number of reactor critical hours for the equipment forced outage indicator, the forced outage hours and generator on-line hours for the forced outage rate indicator, the number of forced outages for the equipment forced outage indicator, and the outage type (whether forced or scheduled) for the forced outage rate. The GL 97-02 shutdown experience dataset includes a listing of reactor shutdowns in the previous month, information on method and reason for shutdown, and duration of outages.

Much of the MOR data is also reported to NRC or other federal agencies through other channels. For instance, power operating statistics are reported to the Energy Information Administration (EIA) via Forms EIA-759, EIA-423, EIA-826, and EIA-861, and others. Reporting of unplanned automatic reactor shutdowns and unplanned large reductions in power is required by the NRC Reactor Oversight Program (ROP) Performance Indicators. Additionally, 10 CFR 50.73, "Licensee Event Reports," requires that detailed Licensee Event Reports be submitted for plant shutdowns resulting from unplanned reactor automatic and manual scrams, and for completion of plant shutdowns required by TS.

The current St. Lucie MOR TS reporting requirements include the reporting of pressurizer power operated relief valve (PORV) and safety valve failures and challenges. This reporting requirement is based on the guidance in NUREG-0694, "TMI-Related Requirements for New Operating Licensees." The guidance of NUREG-0694 states: "Assure that any failure of a PORV or safety valve to close will be reported to the NRC promptly. All challenges to the PORVs or safety valves should be documented in the annual report." However, NRC Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," requests the submittal of less information in the monthly operating report. The generic letter identifies what needs to be reported to support the NRC Performance Indicator Program, and availability and capacity statistics. The generic letter does not specifically identify the need to report challenges to the pressurizer PORVs and relief valves. The industry proposed and the NRC accepted the elimination of the reporting requirements in TS for challenges to pressurizer PORVs and safety valves in Revision 4 to TSTF 258-A, "Changes to Section 5.0, Administrative Controls," (Reference 6). The staff's acceptance of TSTF 258-A and subsequent approval of plant-specific adoptions of TSTF 258-A is based on the fact that the information on challenges to PORVs and safety valves is not used in the evaluation of the MOR data, and that the information needed by the NRC is adequately addressed by the reporting

requirements contained in 10 CFR 50.73. [By reference 7, FPL submitted a TS change to delete the requirement to provide documentation of all challenges to the pressurizer PORVs or safety valves in the MOR. However, this LAR also documents the acceptability for removing the PORV and safety valve challenges from the existing MOR reporting requirements, as well as completely eliminating the MOR reporting requirements. The TS markups provided are based on the existing TS MOR reporting requirements.]

The MORs do, however, provide a compilation of the operating statistics and shutdown experience that can be used for a convenient reference of plant operating information and for general trending of power operating performance. In keeping with the nature of the information, data from the MORs is used by NRC to keep abreast of overall nuclear plant power generation statistics. For instance, NRC publishes yearly trend graphs of Forced Outage Rate and Equipment Forced Outages, which is extracted from the MOR datasets.

At present, all licensees provide a letter report submittal to NRC each month which includes the MOR data. As noted previously, the majority of plants use the GL 97-02 recommended dataset. To take advantage of efficiencies afforded by electronic reporting and use of standardized reporting templates, the industry has been involved in the establishment of a shared database, which compiles the MOR data as an electronic GL 97-02 dataset. NRC has been kept apprised of this effort through periodic meeting with the LATF. The reporting database has been pilot tested and is now available for utilities to use. The protocol for electronic MOR reporting using this industry database is a combined (all nuclear plants) quarterly electronic submittal of monthly operating and shutdown history data (same data required by GL 97-02). The proposed quarterly reporting frequency was chosen for consistency with the current reporting frequency of the NRC ROP performance indicators.

To support the industry effort, this TSTF proposes a change to STS that would delete the STS submittal requirement based on an individual licensee's commitment to report MOR data via the combined industry database. This change is also applicable to the MOR reporting requirements contained in the custom St. Lucie TSs.

Electronic reporting of operating data provides NRC with the same MOR dataset prescribed by GL 97-02, yet relieves licensees of the administrative burdens of preparing monthly letter-based report submittals. Efficiencies should also be realized by NRC in that use of a standard database for submittal of operating statistics will facilitate NRC's ability to compile and permute the data. Hence, this proposed alternative reporting process would provide administrative burden reduction for licensees, without an adverse impact on reactor safety or plant operation.

#### ORER

10 CFR 20 provides the personnel radiation exposure reporting requirements for nuclear power plants and other licensees. 10 CFR 20.2206(c) specifically requires that each licensee file a report of radiation exposures and radioactive material intake for monitored personnel no later than April

30 of each year, covering the previous year. NRC Form 5 or electronic media including the equivalent of NRC Form 5 is used for this purpose.

The information provided by the 10 CFR 20.2206 reporting requirement is used by NRC to evaluate trends regarding effectiveness of overall NRC and licensee radiation protection programs, and for comparative analyses of radiation protection performance among nuclear facilities. The data is also used as one of the metrics in NRC's Reactor Oversight Program and for inspection planning purposes, and for various other NRC applications. The data reported under 10 CFR 20.2206 is compiled by NRC and presented in the series of NUREG-0713 reports, "Occupational Radiation Exposure at Commercial Nuclear Power Plants," which are published annually.

TS 6.9.1.5 requires an additional annual report be submitted tabulating the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, who received an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent, compiled according to work and job functions (e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance, waste processing, and refueling). The ORER supplements the reporting requirements of 10 CFR 20.2206; however, it is not required by 10 CFR 20.2206.

ORER data was also previously presented in NUREG-0713, through Volume 19 (report for calendar year 1997). In Volume 20 of NUREG-0713 (report for calendar year 1998), NRC announced that the ORER dose data by work function and employee type would no longer be published in the NUREG. Based on this, it is appropriate that licensees should not be required to continue to submit the ORER data to NRC. The proposed reduction in reporting requirements provides an administrative burden reduction and associated cost savings without creating an adverse impact on plant or radiation protection safety.

This LAR does not change the existing custom St. Lucie TS annual reporting requirements for primary coolant activity sample results exceeding the limits of TS 3.4.8.

## CONCLUSION

A number of NRC reporting requirements are specified in Title 10 of the Code of Federal Regulations (CFR), which provide prescriptive criteria for reporting events and information. An example of this is 10 CFR 50.73, which requires that licensees provide reports for specified plant events and conditions. There are no 10 CFR regulations that directly require the submittal of the MOR, which rather is specified by individual plant TSs. Since MOR data is of a general informational nature, and is not required by statute or used to support licensing applications, the means and frequency of submittal of the MOR data to NRC is not restricted by 10 CFR. Accordingly, this proposed change does not alter or change any existing reporting obligations required by 10 CFR and maintains consistency with required applicable regulatory requirements.

10 CFR 20 provides the base radiation personnel exposure reporting requirements for nuclear power plants. 10 CFR 20.2206(c) requires that each licensee file a report of radiation exposures and radioactive material intake for monitored personnel for the previous year. There are no 10 CFR regulations that require the submittal of the ORER data, which rather is specified by individual plant TSs. The ORER data is of a general informational nature, and is not required by statute or used to support licensing applications. Accordingly, this proposed change does not alter or change any existing reporting obligations required by the Code of Federal Regulations and maintains consistency with required applicable regulatory requirements.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

#### REFERENCES

1. SECY-02-0081, May 13, 2002, NRC Letter from W. D. Travers to NRC Commissioners - Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees.
2. SECY-02-0081, June 25, 2002, NRC Letter from A. L. Vietti-Cook to W. D. Travers - Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees.
3. Letter dated July 2, 2001, from NEI to NRC, Workshop on Reducing Unnecessary Regulatory Burden.
4. November 24, 2003, NRC Letter from Eric J. Leeds to James W. Davis - Licensing Action Task Force and the Reducing Unnecessary Burden Initiative.
5. TSTF 369, Revision 1, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report."
6. TSTF 258-A, Revision 4, "Administrative Controls."
7. FPL Letter L-2005-056, "Proposed License Amendments Adoption of Selected Improved Standard Technical Specification (ISTS) Travelers and Selected ISTS Requirements," dated April 21, 2005.

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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

#### DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

**Description of amendment request:** Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specification (TS) revisions. The proposed amendments would eliminate the Monthly Operating Report (MOR) and Occupational Radiation Exposure Report from the TSs. These proposed amendments are justified by TSTF 369, Revision 1, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," and Federal Register Notice 69 FR 35067.

The Licensee Action Request (LAR) has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed change eliminates the Technical Specifications (TSs) reporting requirements to provide a monthly operating report of shutdown experience and operating statistics if the equivalent data is submitted using an industry electronic database. It also eliminates the TS reporting requirement for an annual occupational radiation exposure report, which provides information beyond that specified in NRC regulations. The proposed change involves no changes to plant systems or accident analyses. As such, the change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accidents or transients. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed change does not involve a physical alteration of the plant, add any new equipment, or require any existing equipment to be operated in a manner different from the present design. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated..

3. Does the proposed change involve a significant reduction in a margin of safety?

No. This is an administrative change to reporting requirements of plant operating information and occupational radiation exposure data, and has no effect on plant equipment, operating practices or safety analyses assumptions. For these reasons, the proposed change does not involve a significant reduction in the margin of safety.

Based upon the reasoning presented above, the requested change does not involve a significant hazards consideration.

### Summary

Based on the above discussion, FPL has determined that the proposed amendment requests do not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; therefore, the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.

### **Environmental Consideration**

The proposed amendments are confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendments meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendments.

### **Conclusion**

FPL concludes, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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ST. LUCIE UNITS 1 AND 2 MARKED-UP  
TECHNICAL SPECIFICATION PAGES

Unit 1 TS Page 6-16  
Unit 1 TS Page 6-16a  
Unit 2 TS Page 6-16  
Unit 2 TS Page 6-17

ADMINISTRATIVE CONTROLS

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS<sup>1/</sup>

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) for whom monitoring was required receiving Annual Deep Dose Equivalent exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions,<sup>2/</sup> e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total Deep Dose Equivalent received from external sources should be assigned to specific major work functions.

Annual reports shall ~~also~~ include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last

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<sup>1/</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

~~<sup>2/</sup> This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.~~

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ADMINISTRATIVE CONTROLS

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isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

~~6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the NRC, no later than the 15th of each month following the calendar month covered by the report.~~

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ADMINISTRATIVE CONTROLS

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS<sup>1/</sup>

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include/

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was required receiving Annual Deep Dose Equivalent exposures

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<sup>1/</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

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greater than 100 mrems/yr and their associated man-rem exposure according to work and job functions,<sup>2)</sup> e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total Deep Dose Equivalent received from external sources should be assigned to specific major work functions.

- b. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

~~6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the NRC, no later than the 15th of each month following the calendar month covered by the report.~~

Deleted.

~~This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.~~

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ST. LUCIE UNITS 1 AND 2 WORD PROCESSED  
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Unit 1 TS Page 6-16a  
Unit 2 TS Page 6-16  
Unit 2 TS Page 6-17

**ADMINISTRATIVE CONTROLS**

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

**ANNUAL REPORTS<sup>1/</sup>**

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Annual reports shall include the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last

<sup>1/</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

**ADMINISTRATIVE CONTROLS**

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isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

**MONTHLY OPERATING REPORTS**

6.9.1.6 Deleted

**ADMINISTRATIVE CONTROLS**

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**6.9 REPORTING REQUIREMENTS**

**ROUTINE REPORTS**

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC.

**STARTUP REPORT**

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

**ANNUAL REPORTS<sup>1/</sup>**

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include

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<sup>1/</sup> A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

ADMINISTRATIVE CONTROLS

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ANNUAL REPORTS (Continued)

the results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

6.9.1.6 Deleted