

From: Orf, Tracy
Sent: Friday, April 22, 2011 1:14 PM
To: 'Wasik, Chris'
Subject: St. Lucie Unit 1 EPU - request for additional information (Human Factors)

Dear Mr. Wasik,

By letter dated November 22, 2010 (Agencywide Documents Access and Management System Accession No. ML103560415) Florida Power & Light Company (the licensee) submitted a license amendment request for St. Lucie Unit 1.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's submittal and has concluded that additional information is required from the licensee in order for the NRC staff to complete their review. The questions below describe these requests for additional information (RAIs).

The NRC requests that the licensee respond to these RAIs within 30 days of the date of this e-mail. If the licensee concludes that more than 30 days are required to respond to the RAIs, the licensee should request additional time, including a basis for why the extension is needed.

Please contact me at the number below or by e-mail if you have any questions on this issue or if you require additional time to submit your responses.

Sincerely,

Tracy J. Orf, Project Manager
St. Lucie
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
Phone: (301) 415-2788

REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING LICENSE AMENDMENT REQUEST FOR
EXTENDED POWER UPRATE
ST. LUCIE PLANT, UNIT NO.1
DOCKET NO. 50-335

IHPB-1: The St. Lucie site includes two plants, Unit 1 and Unit 2, but this LAR addresses only Unit 1. Are operators trained and licensed to operate either unit? If so, how has this been considered in the EPU implementation plan, e.g. how will potential human errors be prevented or minimized during the time period when the units are significantly different? Also, it is not clear that all changes to the control room,

simulator, procedures, training, and SPDS will be coordinated and completed prior to EPU implementation – provide a statement to that effect, along with a timeline showing completion milestones for the various human performance initiatives for both units and the associated EPU implementation dates.

- IHPB-2:** In Topic 2.0 of Section 2.11.1.2.2, “Changes to Operator Actions Sensitive to Power Uprate”, the licensee did not answer the question completely. The licensee stated that there will be no changes to operator workarounds – this does not address the concern of operator workarounds increasing operator workloads beyond what is already required for the EPU. Therefore, identify and describe any operator workarounds that will exist after the EPU is implemented. Explain why these operator workarounds will not affect the response time of any required Emergency Operating Procedure (EOP) or Off-normal Procedure (ONP) actions.
- IHPB-3:** In Section 2.11.1 of the LAR, “Human Factors”, much credit is taken for “approved plant procedures and processes such as the modification process”. To augment the NRC staff’s understanding of this topic, provide the licensee-approved procedures that are used for human factors engineering review and the procedures that address verification and validation of Emergency Operating Procedure (EOP) or Off-normal Procedure (ONP) actions and their associated interfaces.
- IHPB-4:** Will the EPU require any operator interface changes from analog to digital? If so, list those digital changes that change, add, or delete displays used by operators, discuss any differences between the analog display and the digital display, and justify equivalency or describe the advantages of digital display to the operator(s).