



April 3, 2015

L-2015-103  
10 CFR 50.90

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

St. Lucie Plant Units 1 and 2  
Docket Nos. 50-335 and 50-389

Re: License Amendment Request Supplement  
Administrative Controls – Responsibility and Organization –  
Shift Technical Advisor

References:

1. S. Lingam (NRC) letter to M. Nazar (FPL), “St. Lucie Plant Units Nos. 1 and 2 – Issuance of Amendments Regarding Standardization of Administrative Controls – Responsibility and Organization (TAC Nos. MF2496 and MF2497),” February 7, 2014, (ADAMS Accession No. ML14016A248).
2. FPL Letter L-2013-190 dated July 26, 2013, “License Amendment Request – Standardization of Administrative Controls – Responsibility and Organization,” (ADAMS Accession No. ML13219A840).
3. K. N. Jabbour (NRC) letter to T. F. Plunkett (FPL). “St. Lucie Plant, Units 1 and 2 – Issuance of Amendments Regarding Shift Technical Advisor Staffing Requirements (TAC Nos. MB0611 and MB0612),” March 14, 2001, (ADAMS Accession No. ML010860127).
4. FPL Letter L-2014-129 dated June 9, 2014, “License Amendment Request Administrative Controls – Responsibility and Organization – Shift Technical Advisor,” (ADAMS Accession No. ML14175A121).

In Reference 4, Florida Power & Light Company (FPL) requested to amend Renewed Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 to correct an unintended consequence of license amendments 217/167 to St. Lucie Units 1 and 2, approved by Reference 1.

FPL’s Reference 2 license amendment request (LAR) inadvertently deleted a criterion for manning the shift technical advisor (STA) position. Specifically, the change removed the ability to allow each unit in Modes 1, 2, 3, or 4 be manned by an STA qualified individual holding a Senior Reactor Operator’s license. This criterion was previously approved by the NRC and incorporated into the St. Lucie Technical Specifications (TS) by Amendments 173/113 in Reference 3.

ADD 1  
NRK

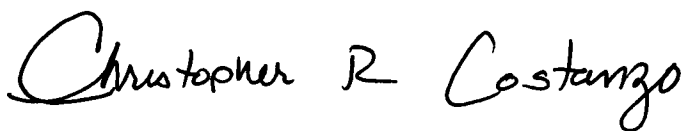
The NRC Staff required additional clarification on the justification and wording for the proposed TS changes proposed in Reference 4. This letter provides the supplemental information requested by the NRC. The TS markups in Attachment 1 replace the TS markups provided in Reference 4.

The original no significant hazards evaluation bounds the changes contained in this submittal. Should you have any question regarding this submittal, contact Ken Frehafer at (772) 467-7748.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on April 3<sup>rd</sup>, 2015.

Sincerely,

Handwritten signature of Christopher R. Costanzo in black ink.

Christopher R. Costanzo  
Site Vice President  
St. Lucie Plant

Attachment

cc: NRC Region II Administrator  
NRC Site Resident Inspector  
Ms. Cynthia Becker Chief – Florida Bureau of Radiation Control

NRC Request:

The LAR justification and proposed TS wording is not clear. The NRC staff requests that the justification and proposed TS wording be clarified.

FPL response:

As approved, TS amendments 173/113 required that the STA position be filled for each unit in Modes 1, 2, 3, and 4. When required, the STA position for the unit could be manned by either a dedicated STA, an STA qualified Shift Supervisor, or an STA qualified SRO assigned to the unit. Additionally, when used, the dedicated STA or STA qualified Shift Supervisor can be used to fill the STA position on the opposite unit as well.

This letter clarifies that the STA position needs to be filled for each unit in Modes 1, 2, 3, and 4. When required, the STA position for the unit could be manned by either a dedicated STA, an STA qualified Shift Supervisor, or an STA qualified SRO assigned to the unit. Additionally, when used, the dedicated STA or STA qualified Shift Supervisor can be used to fill the STA position on the opposite unit as well.

This wording restores the original STA manning intent as approved in TS amendments 173/113. FPL proposes the following changes to TS 6.2.2.e:

An individual (Shift Technical Advisor (STA)) shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. ~~The STA may be an STA qualified Shift Supervisor, or a dedicated STA. The STA shall be manned while either unit is in MODES 1, 2, 3, or 4. A single STA may fill the position for both units.~~ The STA position shall be manned in MODES 1, 2, 3, or 4 by use of either a dedicated STA, a Shift Supervisor who meets the qualifications for the STA as required by Technical Specification 6.3.1, or an individual assigned to the unit with a Senior Reactor Operator's license who meets the qualifications for the STA as required by Technical Specification 6.3.1. If the STA position is filled by an STA qualified Shift Supervisor or dedicated STA, then the individual may fill the same position on Unit [1 or 2].

## Unit 1 Markup

### 6.0 ADMINISTRATIVE CONTROLS

#### 6.2 ORGANIZATION (continued)

##### UNIT STAFF

6.2.2 The unit staff organization shall meet the requirements of 10 CFR 50.54(m) and include the following:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. A minimum of three non-licensed operators is required when both ~~units~~ <sup>units</sup> are in MODES 5 or 6.
- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.e for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- c. A health physics technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. The operations manager or assistant operations manager shall hold an SRO license.
- e. An individual (Shift Technical Advisor (STA)) shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. ~~The STA may be an STA-qualified Shift Supervisor, or a dedicated STA. The STA shall be manned while either unit is in MODES 1, 2, 3, or 4. A single STA may fill the position for both units.~~

The STA position shall be manned in MODES 1, 2, 3, or 4 by use of either a dedicated STA, a Shift Supervisor who meets the qualifications for the STA as required by Technical Specification 6.3.1, or an individual assigned to the unit with a Senior Reactor Operator's license who meets the qualifications for the STA as required by Technical Specification 6.3.1. If the STA position is filled by an STA-qualified Shift Supervisor or dedicated STA, then the individual may fill the same position on Unit 2.

## Unit 2 Markup

### 6.0 ADMINISTRATIVE CONTROLS

### 6.2 ORGANIZATION (Continued)

#### UNIT STAFF

- 6.2.2 The unit staff organization shall meet the requirements of 10 CFR 50.54(m) and include the following:
- A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. A minimum of three non-licensed operators is required when both units are in MODES 5 or 6.
  - Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.e for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - A health physics technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - The operations manager or assistant operations manager shall hold an SRO license.
  - An individual (Shift Technical Advisor (STA)) shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. ~~The STA may be an STA qualified Shift Supervisor, or a dedicated STA. The STA shall be manned while either unit is in MODES 1, 2, 3, or 4. A single STA may fill the position for both units.~~

The STA position shall be manned in MODES 1, 2, 3, or 4 by use of either a dedicated STA, a Shift Supervisor who meets the qualifications for the STA as required by Technical Specification 6.3.1, or an individual assigned to the unit with a Senior Reactor Operator's license who meets the qualifications for the STA as required by Technical Specification 6.3.1. If the STA position is filled by an STA qualified Shift Supervisor or dedicated STA, then the individual may fill the same position on Unit 1.

## Word Processed Unit 1 TS

### 6.0 ADMINISTRATIVE CONTROLS

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#### 6.2 ORGANIZATION (continued)

##### UNIT STAFF

- 6.2.2 The unit staff organization shall meet the requirements of 10 CFR 50.54(m) and include the following:
- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. A minimum of three non-licensed operators is required when both units are in MODES 5 or 6.
  - b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.e for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - c. A health physics technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - d. The operations manager or assistant operations manager shall hold an SRO license.
  - e. An individual (Shift Technical Advisor (STA)) shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. The STA position shall be manned in MODES 1, 2, 3, or 4 by use of either a dedicated STA, a Shift Supervisor who meets the qualifications for the STA as required by Technical Specification 6.3.1, or an individual assigned to the unit with a Senior Reactor Operator's license who meets the qualifications for the STA as required by Technical Specification 6.3.1. If the STA position is filled by an STA qualified Shift Supervisor or dedicated STA, then the individual may fill the same position on Unit 2.

## Word Processed Unit 2 TS

### 6.0 ADMINISTRATIVE CONTROLS

#### 6.2 ORGANIZATION (Continued)

##### UNIT STAFF

- 6.2.2 The unit staff organization shall meet the requirements of 10 CFR 50.54(m) and include the following:
- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. A minimum of three non-licensed operators is required when both units are in MODES 5 or 6.
  - b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.e for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - c. A health physics technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - d. The operations manager or assistant operations manager shall hold an SRO license.
  - e. An individual (Shift Technical Advisor (STA)) shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. The STA position shall be manned in MODES 1, 2, 3, or 4 by use of either a dedicated STA, a Shift Supervisor who meets the qualifications for the STA as required by Technical Specification 6.3.1, or an individual assigned to the unit with a Senior Reactor Operator's license who meets the qualifications for the STA as required by Technical Specification 6.3.1. If the STA position is filled by an STA qualified Shift Supervisor or dedicated STA, then the individual may fill the same position on Unit 1.