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SUBJECT: Requests mod of subj facil Environ Tech Specs per 770801 ltr proposal.
Changes cover Section 3.1.B.e-Water Quality & Section 5.0-Administrative Controls & are administrative in nature. W/encl proposed mods.

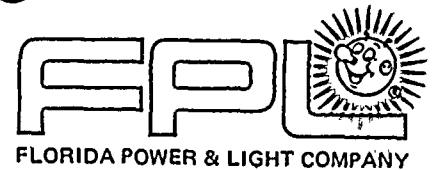
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CHANGE REQUESTS FOR ENVIRON TECH SPECS (APPEND B)

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NOTES:

Enviro 2
60



September 29, 1978
L-78-314

Office of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

Re: St. Lucie Unit No. 1
Docket Nos. 50-335
Revision to Environmental Technical Specifications
Operating License DPR-67

In accordance with 10 CFR 50.30, Florida Power & Light Company submits herewith three (3) signed originals and forty (40) copies of a request to modify St. Lucie Unit No. 1 Environmental Technical Specifications (ETS).

This request supplements our proposed ETS changes submitted by letter dated August 1, 1977, (L-77-244). Pages 5-1, 5-2, 5-3, and 5-4 contain changes to Section 5.0, "Administrative Controls," which reflect individual title changes and department name changes, and replace the respective pages contained in our previous submittal in their entirety. Also included is a proposed change to Section 3.1.B.e, "Water Quality," which is described below. All of the changes are shown on the attached revised ETS pages bearing the date of this letter in the lower right hand corner.

The revision of ETS 3.1.B.e is administrative in nature and clarifies the intended frequency for monitoring of selected nutrients in the ocean water. Our sample collection schedule currently consists of temperature, salinity, dissolved oxygen content, and turbidity samples at bottom, mid-depth, and surface levels at the same time biological samples are collected. Selected nutrients are collected at all three depths at the same time the phytoplankton and zooplankton are sampled. This nutrient sampling regime was established based on Florida Power & Light's interpretation of the existing ETS. The change will make this sampling frequency clear.

The sampling regime currently in practice is consistent with potential data usage since only phytoplankton productivity studies and correlations would be related to the nutrient levels in the ocean. Benthos, macrophytes, nekton and migratory sea turtle studies have little direct dependence on nutrient levels in the water column.

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Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
September 29, 1978
Page 2

The Company Nuclear Review Board and the Company Environmental Review Group have reviewed the proposed revisions and have determined that they do not affect the environmental assessment of the licensed facility nor do they involve an unreviewed safety question. FPL has determined that this is a Class II amendment per the criteria of 10 CFR 170.22 and accordingly encloses a check in the amount of \$1,200.00.

Very truly yours,



for R. E. Uhrig
Vice President

REU:NLR:cf

Attachment

cc: J. P. O'Reilly, Region II
Harold Reis, Esq.



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Specification

The biological conditions shall be assessed, 1) in terms of abundance and compositions of the marine biotic community, and 2) the relationship between certain chemical and physical properties of the waters and the character of the biological community.

The five sampling locations established during a pre-operational baseline biology program will be utilized for plankton, trawl, and benthic collections. The sampling schedule will be as follows:

- a. Benthic Organisms - Benthic organisms will be collected quarterly and inventoried as to type and abundance of major taxonomic groups present.
- b. Plankton - Plankton samples will be collected monthly. Both zooplankton and phytoplankton species will be identified as to kind and abundance. Chlorophyll "a" analysis will be performed as a measure of primary productivity.
- c. Nektonic Organisms - Samples will be collected monthly by trawling, seining, or other suitable method. Types and numbers of organisms present will be determined, including species of migratory fish of commercial and sports fisheries value such as blue fish and mackerel.
- d. Macrophytes - Macroscopic aquatic vegetation will be collected quarterly and identified as to species and abundance.
- e. Water Quality - Analysis will be made on water samples taken at bottom, mid-depth, and surface levels at the same time as the biotic samples are collected. Parameters studied will be temperature, salinity, dissolved oxygen content, turbidity. Water samples for selected nutrient analyses will be collected at the time of plankton sampling.
- f. Migratory Sea Turtles - The species, numbers, and nesting characteristics of sea turtles that migrate in from the sea and nest along the east coast of Florida will be determined on the FPL shoreline property and selected adjacent control areas in 1975 and 1977. A study shall be conducted to determine the effects of the discharge thermal plume on turtle nesting patterns and turtle hatchling migration. In addition, control studies on temperature stress, hatching, and rearing factors will be conducted using turtle eggs from displaced nests.

Based on the data obtained, predictions will be made on the impact of the plant's operation on baseline biological conditions and current uses of the waters.

Florida Power and Light will review the data after two years of plant operation. If effects attributable to the plant are found acceptable, the results shall be reviewed by NRC to determine if the biotic program, or any portion thereof, should be terminated.

5.0 ADMINISTRATIVE CONTROLS

The purpose of this section is to describe the administrative and management controls necessary to provide continuing protection to the environment, and to implement the environmental technical specifications (ETS).

5.1 Responsibility

The Director, Licensing & Environmental Planning Department has the ultimate responsibility for the implementation of the ETS. He may delegate to other departments and/or organizations the work of establishing and executing portions of the ETS, but shall retain responsibility thereof.

The Licensing & Environmental Planning Department is responsible for executing the non-radiological biotic and special studies sections of the ETS. The Vice President of Power Resources is responsible for executing the non-radiological abiotic, radioactive effluents, and the Radiological Environmental Surveillance sections.

The Director of Quality Assurance shall be responsible for periodic audits, conducted according to the corporate Quality Assurance program, to insure compliance with the ETS.

5.2 Organization

The corporate organization involved in environmental matters is depicted in Figure 5.2-1.

5.3 Review and Audit

5.3.1 Review of implementation of the ETS shall be made by the Company Environmental Review Group (CERG) or by the Facility Review Group (FRG). Secondary reviews shall be made by the Company Nuclear Review Board (CNRB).

5.3.2 FRG and CNRB membership and responsibilities are described in Appendix A, Technical Specifications.

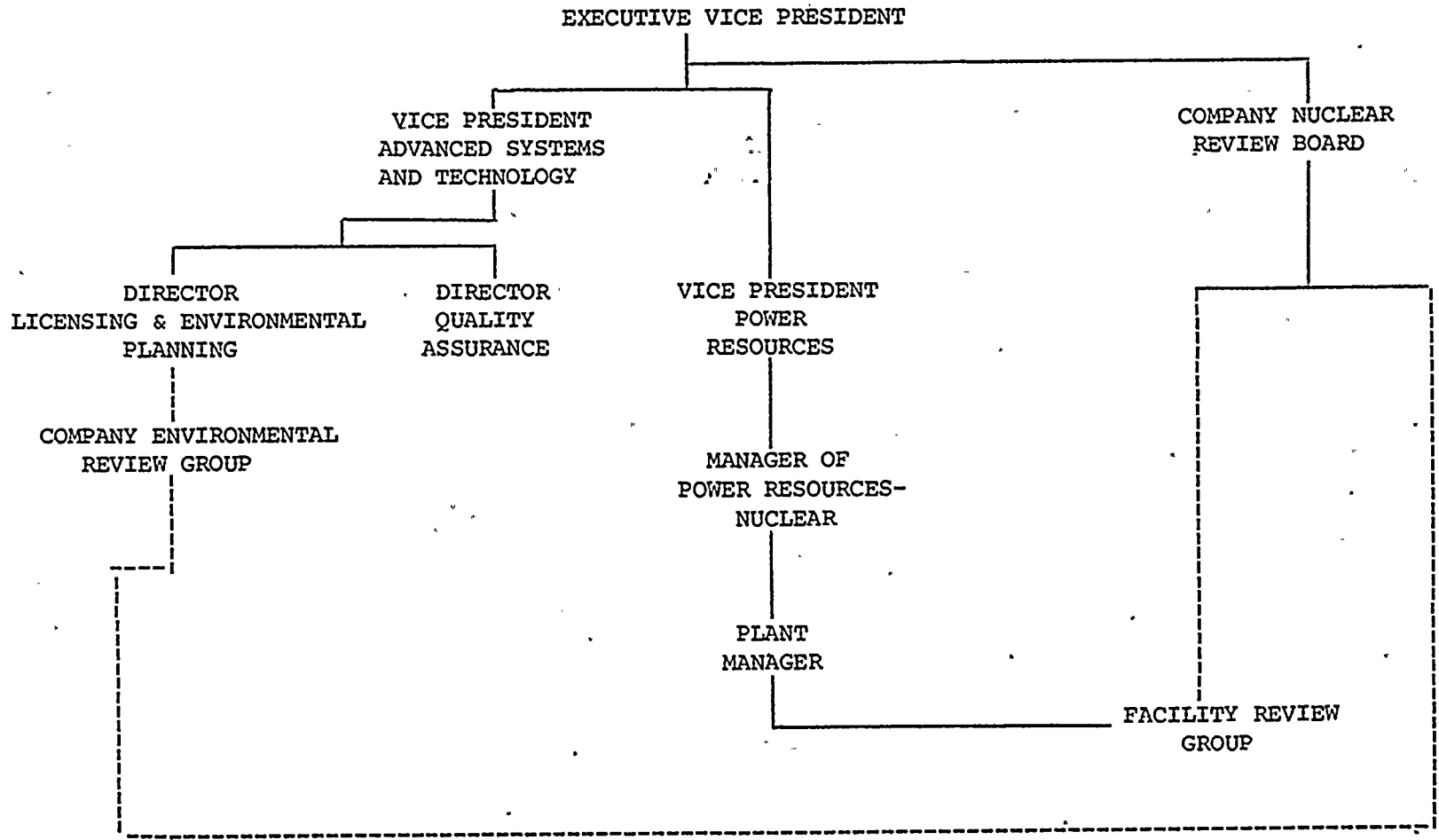
5.3.3 Company Environmental Review Group (CERG)

A. Function

The Company Environmental Review Group (CERG) shall function to advise the Director, Licensing & Environmental Planning Department on all matters related to environmental quality.

B. Membership

1. Manager, Environmental Engineering.- Chairman
2. Manager, Environmental Affairs



FLORIDA POWER & LIGHT COMPANY
 CORPORATE ORGANIZATION - ENVIRONMENTAL AFFAIRS
 FIGURE 5.2-1

———— AUTHORITY
 - - - - COMMUNICATION

9/29/78

3. Environmental Engineer, Environmental Engineering
4. Power Resources Section Supervisor - Test & Performance
5. Environmental Department Life Scientist
6. Environmental Department Senior Project Coordinator
7. Plant Supervisor (Plant involved)
8. Manager - Land Utilization
9. Radiological Emergency Plan Administrator

C. Alternates

Alternate members shall be appointed in writing by the CERG Chairman. No more than two alternates shall participate in CERG activities at any one time.

D. Meeting Frequency

The CERG shall meet at least semiannually and as convened by the CERG Chairman or designated acting Chairman.

E. Quorum

A quorum of the CERG shall consist of the Chairman, or designated acting Chairman and three members including alternates.

F. Responsibilities

1. Review of all Environmental Department procedures required by Environmental Technical Specifications and changes thereto as determined by the Plant Manager to affect the environment.
2. Review results of the environmental monitoring programs prior to their submittal to the NRC.
3. Review of all proposed test and experiments as determined by the Plant Manager to affect the environment.
4. Review of all proposed changes to the Environmental Technical Specifications.
5. Review of all proposed changes or modifications to plant systems or equipment as determined by the Plant Manager to affect the environment.
6. Review of Environmental Technical Specifications reportable occurrences within two months after the event.

7. Review of violations of the Environmental Technical Specifications within two months after notification by the NRC.
8. Performance of special reviews and investigations and reports thereon as required by the Chairman of the Company Nuclear Review Board.

G. Authority

The Company Environmental Review Group shall recommend to the Director, Licensing & Environmental Planning Department written approval or disapproval of the items considered under F.1 through F.5 above.

H. Records

The Company Environmental Review Group shall maintain written minutes of each meeting and copies shall be provided to the Director, Licensing & Environmental Planning Department, Vice President, Power Resources, and the Chairman of the Company Nuclear Review Board.

- 5.3.4 Periodic audits concerning the implementation of the ETS shall be made as provided in the Quality Assurance Manual.
- 5.4 Action to be Taken if a Limiting Condition is Exceeded
 - 5.4.1 When a Limiting Condition is exceeded, action shall be taken as permitted by the applicable specification until the condition can be met.
 - 5.4.2 Exceeding a Limiting Condition shall be investigated by the Company Environmental Review Group or by the Facility Review Group.
 - 5.4.3 All reviews and actions taken, with reasons therefor, shall be recorded and maintained as part of the permanent records.
 - 5.4.4 Each instance whereby a Limiting Condition is exceeded shall be reported to the Company Nuclear Review Board.
- 5.5.5 A report for each occurrence shall be prepared as specified in Section 5.6.2.
- 5.5 Procedures
 - 5.5.1 Detailed written procedures, including applicable check lists and instructions, shall be prepared and followed for activities involved in carrying out the environmental technical specifications. Procedures shall include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are exceeded. Testing frequency of any alarms shall be included.

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