5.3.4 Proposed changes or modifications to plant systems or equipment, which would require a change in the procedures described in 5.5 below, or which have been determined by the Plant Manager to affect the licensed facility's environmental impact.

5.3.5 Proposed tests or experiments which have been determined by the Plant Manager to affect the licensed facility's environmental impact.

5.3.6 Coordination of Environmental Technical Specification (Appendix B to the facility license) development with the Safety Technical Specifications (Appendix A to the facility license) to avoid conflicts and for consistency.

5.3.7 Proposed sampling analyses, calibration and alarm check procedures, as specified in 5.5.1, and any other proposed procedures or changes thereto as determined by the Plant Manager to affect the licensed facility's environmental impact.

5.3.8 Investigation of all reported instances of ETS violations including appropriate recommendations to prevent recurrence.

5.4 Actions 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.

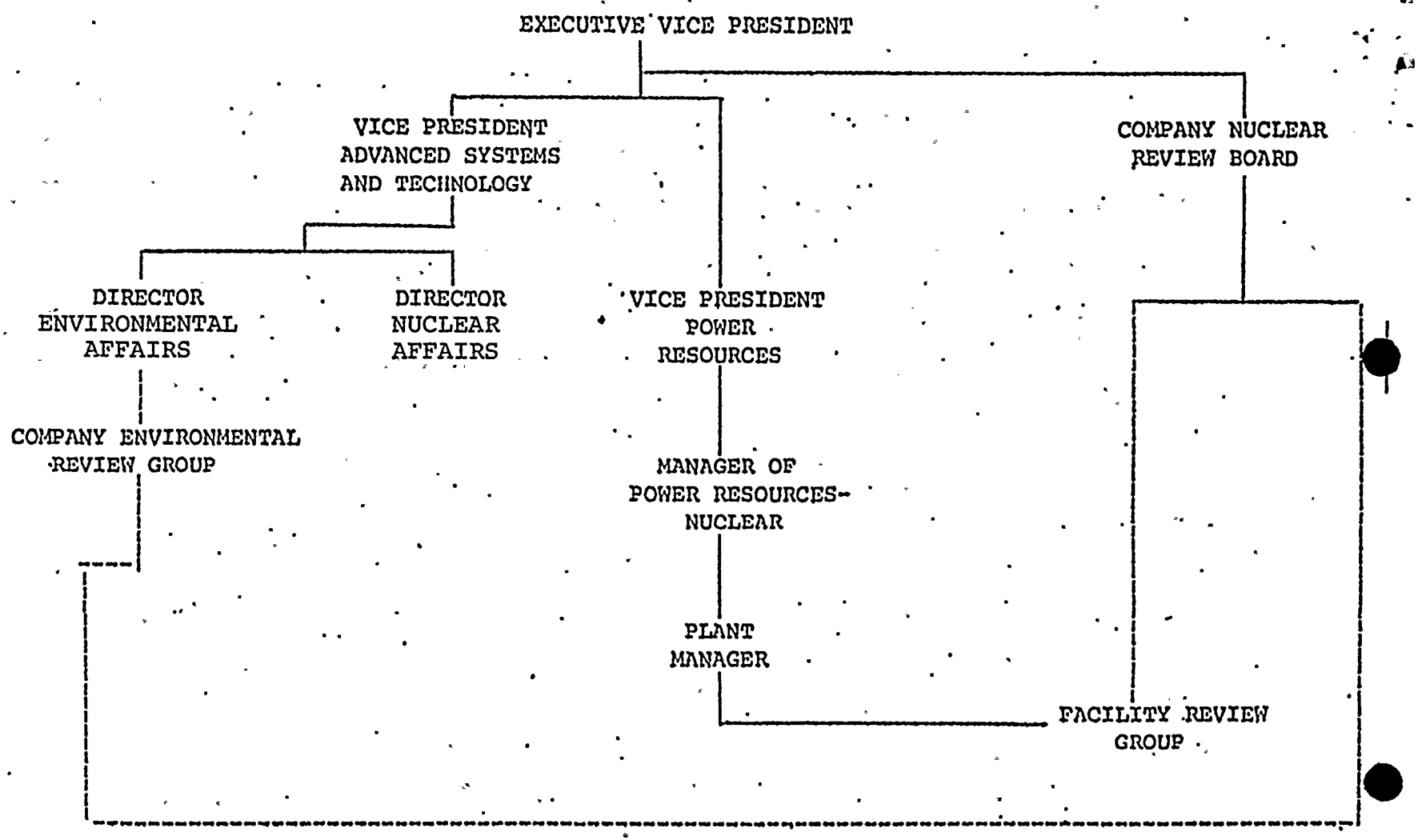
5.4.3 All reviews and actions taken, with reasons therefor, shall be recorded and maintained as part of the permanent records.

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.



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

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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, Environmental Affairs 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 Environmental Affairs 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 Nuclear Affairs 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

Administrative measures shall provide that the individual or group assigned the responsibility for auditing or otherwise verifying that an activity has been performed is independent of the individual or group directly responsible for performing the specific activity. The review function shall be performed by the Company Environmental Review Group (CERG), as described in the Topical Quality Assurance Report, with an audit conducted at least once per year. Contractor operations shall also be audited once per year.

CERG is responsible for management review of items 5.3.1 through 5.3.8 below. Independent audit functions for 5.3.1 and 5.3.8 below will be provided through the Quality Assurance Program.

5.3.1 Environmental Technical Specifications for the facility.

5.3.2 Results of the environmental monitoring programs prior to their submittal in each Annual Environmental Monitoring Report.

5.3.3 Proposed changes to the Environmental Technical Specifications in effect for the facility and the evaluated impact of the changes.

a. Records and drawings detailing plant design changes and modifications made to systems and equipment as described in 5.3.4.

b. Records of all environmental surveillance data.

c. Records to demonstrate compliance with the limiting conditions in Section 2.

5.7.2 All other records and logs relating to the environmental technical specifications shall be retained for five years following logging or recording. These shall include (but are not limited to) the following:

a. Details of any abnormal operating conditions having an effect on the environment, and actions taken to correct those conditions.

b. Maintenance activities to environment monitoring equipment, including but not limited to:

1) routine maintenance and component replacement,

2) equipment failures,

3) replacement of principal items of equipment.

c. Records of radioactivity levels in liquid and gaseous wastes released to the environment.

d. All reviews, including actions taken and reasons therefor, required in Sections 2, 3, and 4 of this specification.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this said 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.

Robert E. Uhrig

Robert E. Uhrig

Subscribed and sworn to before me this

27 day of October, 1980

Cheryl I. Fredrick

NOTARY PUBLIC, in and for the county of Dade, State of Florida

My commission expires: Notary Public, State of Florida at Large My Commission Expires October 30, 1983 Bonded thru Maynard Bonding Agency

P.O. BOX 529100 MIAMI, FL 33152

FLORIDA POWER & LIGHT COMPANY

11/12

October 27, 1980
L-80-354

Office of Nuclear Reactor Regulation
Attn: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit No. 1, Docket No. 50-335
Proposed Amendment to Facility Operating
License DPR-67, Appendix B

In accordance with 10 CFR §§50.90 and 50.30 Florida Power & Light Company (FPL) herewith submits three originals and 40 copies of a request to amend Appendix B to Operating License DPR-67 for St. Lucie Unit No. 1. The amendments are described below and where appropriate are shown on the attached Technical Specification pages bearing the date of this letter in the lower right hand corner.

By its letters dated April 12, 1979 (L-79-88) and September 10, 1979 (L-79-248), FPL requested certain deletions from Appendix B of the St. Lucie Unit No. 1 operating license pertaining to chemical and thermal limits and monitoring requirements. These requests were made on the basis of ALAB-515 (Yellow Creek), since all of the items for which deletion was requested were contained in the unit's NPDES permit. The initial request noted that deletion of the biotic monitoring requirements contained in Section 3.1.B and the Special Surveillance and Special Study Activities contained in Sections 4.1 and 4.2 of Appendix B was not being requested at that time pending discussion with EPA regarding inclusion/clarification in the NPDES permit. Although these requests have still not received formal NRC approval, Section 4.2, "Impingement of Aquatic Organisms," had been previously deleted by NRC on its own accord. (Amendment No. 29 to DPR-67, dated January 24, 1979).

On April 3, 1980, FPL submitted to EPA an application for renewal of the NPDES permit for St. Lucie Unit No. 1. A copy of that

application was forwarded to you at that time. Included as Appendix B to this application, and to be incorporated into the permit, was a revised operational biological monitoring program for St. Lucie Unit No. 1, which would also comprise the preoperational program for St. Lucie Unit No. 2. An application for an NPDES permit for St. Lucie Unit No. 2 will be submitted to EPA in the near future, with a request that a single plant NPDES permit covering both units be issued. On the basis of the above discussion, FPL hereby requests that Sections 3.1.B and 4.1 of Appendix B to Operating License DPR-67 be deleted upon issuance by EPA of an NPDES permit which contains the proposed biological monitoring program for either St. Lucie Unit No. 1 or both units.

The following additional Sections of Appendix B are being submitted for amendment:

Section 5.1 - The Licensing and Environmental Planning Department is now the Environmental Affairs Department. The Director of Quality Assurance is now the Director of Nuclear Affairs. Modifications to reflect these changes have been made on the affected ETS page.

Section 5.2 - Figure 5.2-1 has been modified to reflect the organizational changes noted above.

Section 5.3 - Numerous changes in the titles of those persons comprising CERG membership have occurred. Organizations are continually evolving and it is likely that changes in the designated CERG membership will again occur in the future. To preclude the necessity of subsequent updating of the ETS to reflect organizational changes, FPL is proposing the adoption of wording for this section which references organizations and titles as little as possible. The Review and Audit section of FPL's Turkey Point Plant ETS appears to provide this flexibility and has been adapted to replace the existing Section 5.3 in the St. Lucie Unit No. 1 ETS. Procedural details regarding CERG activities have been, and will continue to be contained in the CERG charter.

Section 5.7.1.a - Reference to 5.3.3.F.5 is changed to reflect the proposed modifications to Section 5.3.

The proposed amendments have been reviewed by both the Company Environmental Review Group and the Company Nuclear Review Board of FPL. They have determined that the proposed amendments are administrative in nature and will result in no adverse effects on the environment.

FPL has determined that this is a Class II amendment in accordance with 10 CFR 170.22 and accordingly encloses a check for $1,200.

Very truly yours,

Robert E. Uhrig
Vice President

REU:TCG:cf

cc: Mr. James P. O'Reilly, NRC Region II
Harold F. Reis, Esquire
Mr. Howard D. Zeller, EPA Region IV

Attachment

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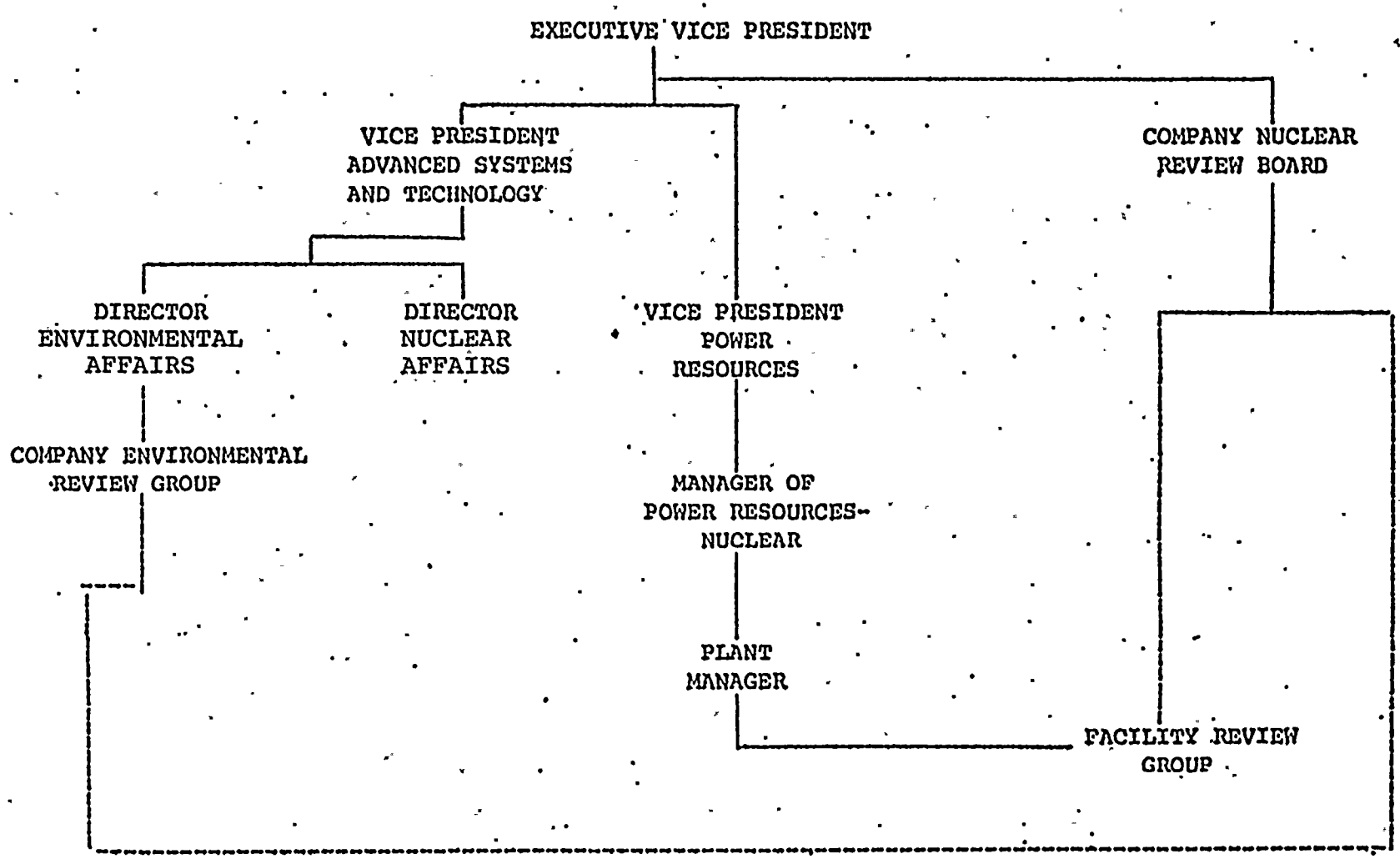

FLORIDA POWER & LIGHT COMPANY
CORPORATE ORGANIZATION - ENVIRONMENTAL AFFAIRS
FIGURE 5.2-1

AUTHORITY

COMMUNICATION

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