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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 UHRIG, R.E. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Informs that requirements stated in Generic Ltr 82-12 re staff working hours adequately enforced by incorporation in administrative procedures. Amend to Tech Specs necessary at present time.

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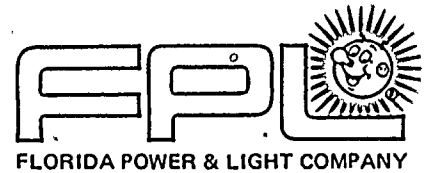
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September 30, 1982
L-82-417

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

Dear Mr. Eisenhut:

Re: St. Lucie Units 1 and 2
Docket No. 50-335 and 50-389
Generic Letter 82-12
Nuclear Power Plant Staff Working Hours

Your Generic Letter 82-12, Nuclear Power Plant Staff Working Hours, transmitted your revised policy on overtime and requested that FPL review our past actions to assure that they are consistent with it. This Generic Letter was the latest in a series of clarifications on the subject of overtime restrictions that began in February 1, 1980 with I&E Bulletin 80-02.

We have reviewed our current status regarding overtime restrictions and conclude that they meet the spirit and intent of your policy statement. Our current policy is the same which was in place and was reviewed against NUREG-0737 and found acceptable by Robert Clark in his February 4, 1982 letter. The same policy will be implemented for St. Lucie Unit 2. This policy was reviewed and accepted by the NRC in NUREG 0843, Section 13.5.1.1(1)f. While there are several differences between NUREG-0737 and 82-12, the major difference appears to be the request to amend the administrative section of the Technical Specifications to assure the procedures and documentation required are followed. It is our position that these requirements are adequately enforced by incorporation in the Administrative Procedures and amending the Technical Specifications is unnecessary at this time.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Robert E. Uhrig', is written over the typed name.

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JEM/mbd

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire

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