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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

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 RECIPIENT NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Application for amend to Licenses DPR-67 & NPF-16, revising facility organization chart & modifying definition of shift technical advisor function.

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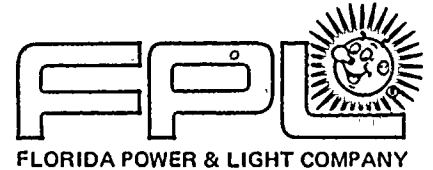
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October 12, 1983
L-83-518

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 & 2
Docket No. 50-335 & 50-389
Proposed License Amendment
Minimum Shift Crew Composition

In accordance with 10 CFR 50.90, Florida Power & Light Company submits herewith three signed originals and forty copies of a request to amend Appendix A of Facility Operating Licenses DPR-67 and NPF-16.

This change provides flexibility in meeting the minimum shift crew complement by utilizing any on-shift SRO from either Unit 1 or Unit 2, providing that SRO is properly qualified as an STA for both units, to satisfy the STA position requirements.

The proposed amendment is described below and shown on the accompanying Technical Specification pages.

Page 6-3 (Unit 1), Page 6-4 (Unit 2)

The Facility Organization chart is revised to change the title of the Watch Engineer to Assistant (Nuclear) Plant Supervisor, and to standardize the title of the Nuclear Plant Supervisor.

Page 6-4 (Unit 1) and Page 6-5 (Unit 2)

A footnote is added to Table 6.2-1 (Minimum Shift Crew Composition) to allow an STA qualified SRO on shift to also fill the STA position.

The note indicated with ## is removed as it only applied prior to Unit 2's operating license issuance and commencement of initial fuel loading.

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Page 6-6 (Unit 2)

The STA function definition is modified.

A discussion of the changes and a safety evaluation is attached.

In accordance with 10 CFR 50.91(b) (I), a copy of this proposed license amendment is being forwarded to the State Designee for the State of Florida.

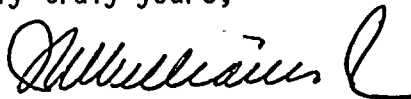
This change is administrative in nature, and it complies with the Draft Commission Policy Statement on Engineering Expertise on Shift as published in the Federal Register on July 25, 1983. Therefore, in accordance with 10 CFR 50.91(a)(I), we have determined that this amendment does not involve any significant hazards considerations pursuant to 10 CFR 50.91(c) in that the amendment does not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed by the St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board.

In that this amendment is essentially administrative in nature, in accordance with 10 CFR 170.22, it has been determined to be a Class I and Class II amendment. A check for \$1,600.00 will follow shortly.

Very truly yours,



J. W. Williams, Jr.
Vice President
Nuclear Energy

JWW/PLP/cab

Attachment

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

Ulray Clark; Administration
Radiological Health Services
Department of Health & Rehabilitative Services
1323 Winewood Boulevard
Tallahassee, Florida 32301

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

 J. W. Williams, Jr. , being first duly sworn, deposes and says:

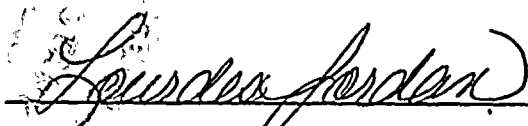

That he is a Vice President of Florida Power & Light Company, the Licensee herein;

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



J. W. Williams, Jr.

Subscribed and sworn to before me this
13th day of October, 1983.



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 DEC 8 1984
BONDED THRU GENERAL INS., UNDERWRITERS



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 PDR

ST. LUCIE - UNIT 1

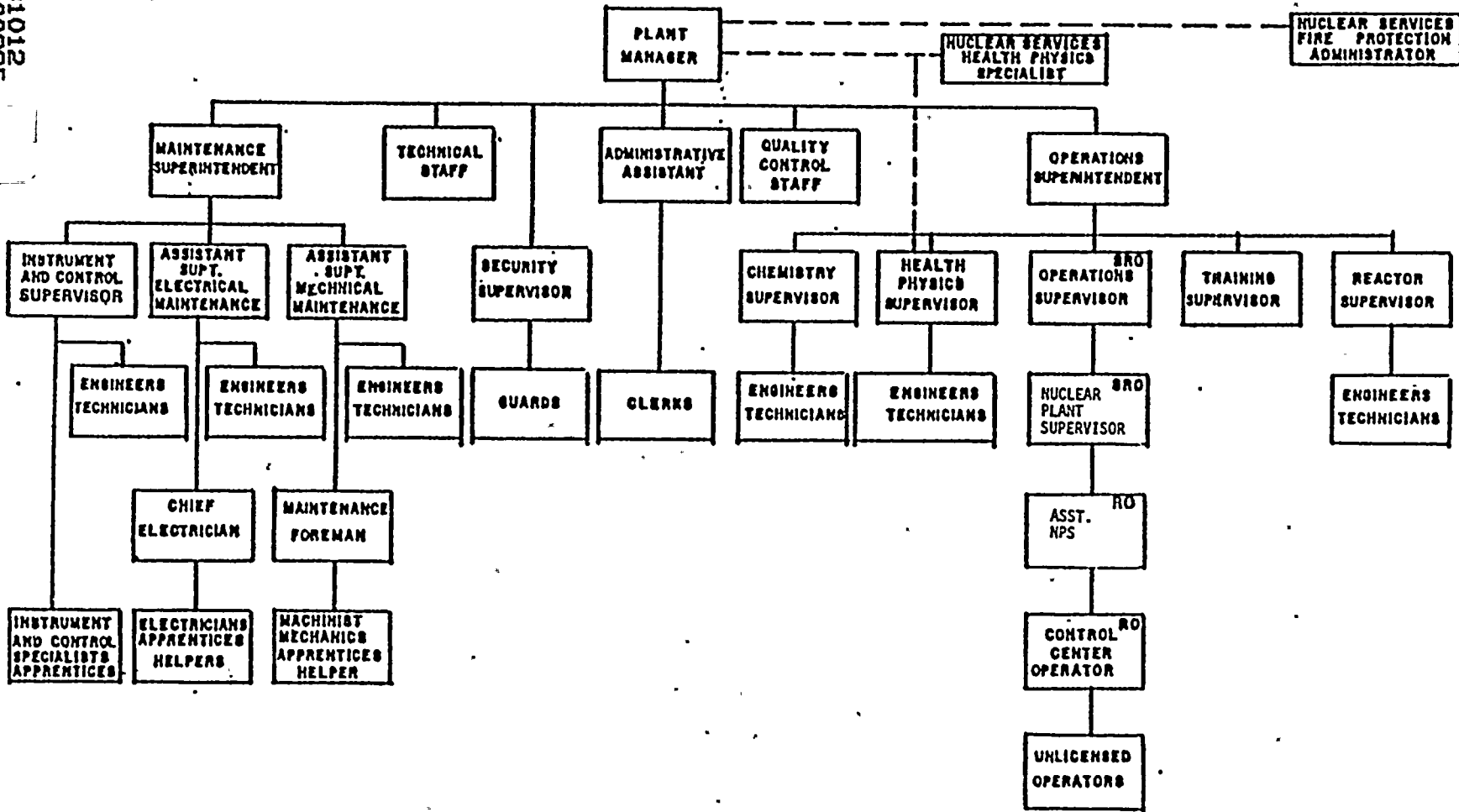


Figure 6.2-2 Facility Organization - St. Lucie Plant, Unit 1

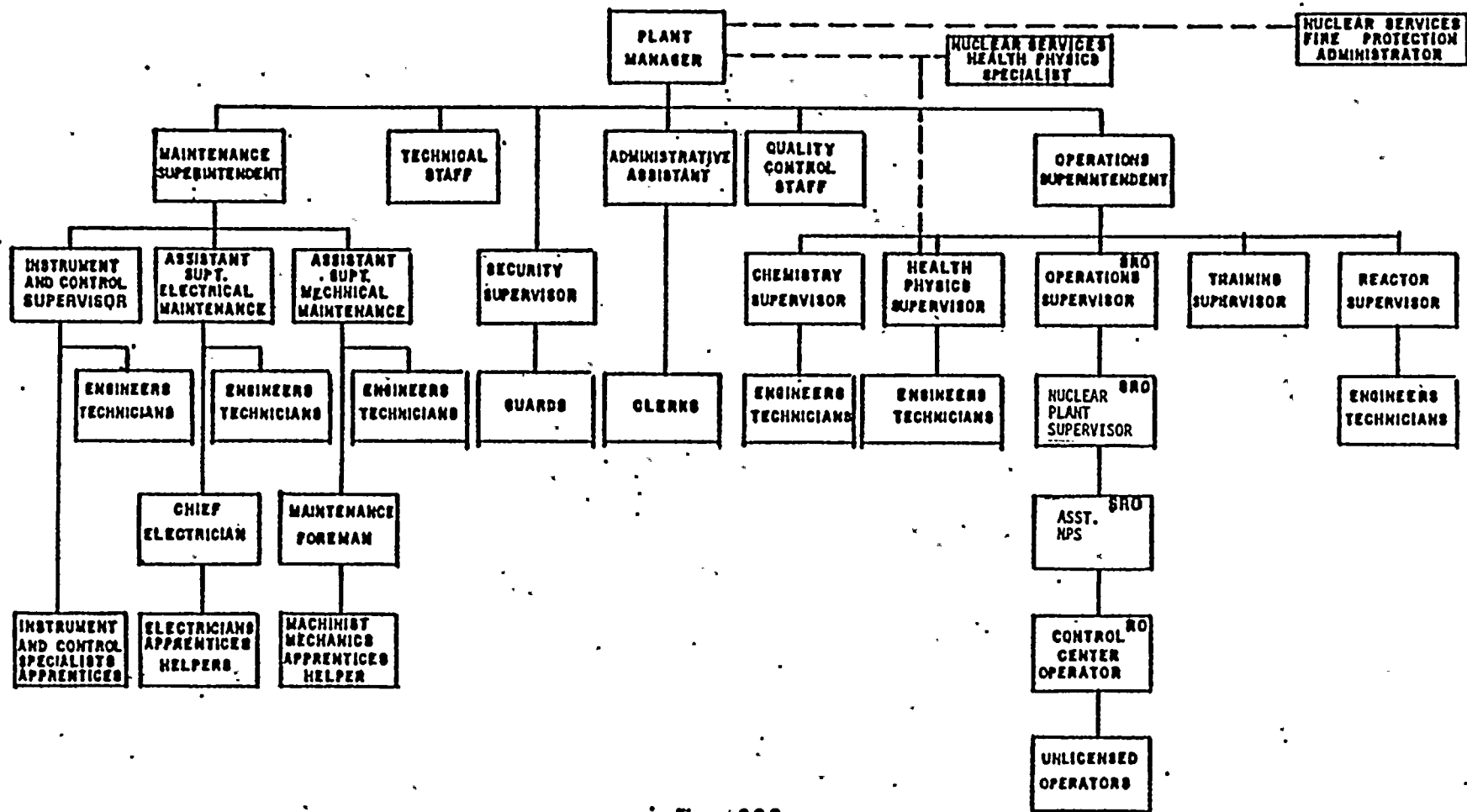


Figure 6.2-2
Unit organization St. Lucie Plant, Unit 2

Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION[#]

WITH THE OTHER UNIT IN MODES 5 OR 6 OR DE-FUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODES 1, 2, 3, & 4	MODES 5 & 6
SS (SRO)	1 ^a	1 ^a
SRO	1	None *
RO	2	1
AO	2	2 ^b
STA	1 ^c	None

WITH THE OTHER UNIT IN MODES 1, 2, 3, OR 4		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODES 1, 2, 3, & 4	MODES 5 & 6
SS (SRO)	1 ^a	1 ^a
SRO	1	None
RO	2	1
AO	2	1
STA	1 ^{a, c}	None

SS - Shift Supervisor

SRO - Licensed Senior Reactor Operator

STA - Shift Technical Advisor

RO - Licensed Reactor Operator

AO - Auxiliary Operator

* Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE ALTERATIONS after the initial fuel loading.

Shift crew composition may be less than the minimum requirements 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 of Table 6.2-1.

a/ Individual may fill the same position on the other unit.

b/ One of the two required individuals may fill the same position on the other unit.

c/ If any of the required SROs on shift meet the STA requirements for both units, that SRO may fill the STA position.

Table 6.2-1
MINIMUM SHIFT CREW COMPOSITION
TWO UNITS WITH TWO SEPARATE CONTROL ROOMS

WITH UNIT 1 IN MODE 5 OR 6 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODE 1, 2, 3, or 4	MODE 5 or 6
SS (SRO)	1 ^a	1 ^a
SRO	1	None
RO	2	1 ^b
AO	2	2 ^b
STA	1 ^c	None

WITH UNIT 1 IN MODE 1, 2, 3 OR 4		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODE 1, 2, 3, or 4	MODE 5 or 6
SS (SRO)	1 ^a	1 ^a
SRO	1	None
RO	2	1
AO	2	1
STA	1 ^{a,c}	None

- SS - Shift Supervisor with a Senior Reactor Operator's License on Unit 2
- SRO - Individual with a Senior Reactor Operator's License on Unit 2
- RO - Individual with a Reactor Operator's License on Unit 2
- AO - Auxiliary Operator
- STA - Shift Technical Advisor

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 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 of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the Control Room while the unit is in MODE 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the unit is in MODE 5 or 6, an individual with a valid SRO or RO license shall be designated to assume the Control Room command function.

- a/ Individual may fill the same position on Unit 1
- b/ One of the two required individuals may fill the same position on Unit 1.
- c/ If any of the required SROs on shift meet the STA requirements for both units, that SRO may fill the STA position.

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISEG shall be composed of five dedicated, full-time members with varied backgrounds and disciplines related to nuclear power plants. No more than two members shall be assigned from any one department. Three or more of the members shall be engineers with a bachelor's degree in engineering or a related science, with at least 2 years of professional level experience in the nuclear field. Any nondegreed ISEG members will either be licensed as a Reactor Operator or Senior Reactor Operator, or will have been previously licensed as a Reactor Operator or Senior Reactor Operator within the last year at the St. Lucie Plant site; or they will meet the qualifications of a department head as specified in Specification 6.3.1 of the St. Lucie Unit 2 Technical Specifications. The qualifications of each nondegreed candidate for the ISEG shall be approved by the Assistant Chief Engineer - Power Plant Engineering, prior to joining the group.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of selected plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving plant safety to the Assistant Chief Engineer-Power Plant Engineering.

AUTHORITY

6.2.3.4 The ISEG is an onsite independent technical review group that reports offsite to the Assistant Chief Engineer-Power Plant Engineering. The ISEG shall have the authority necessary to perform the functions and responsibilities as delineated above.

RECORDS

6.2.3.5 Records of activities performed by the ISEG shall be prepared, maintained and a report of the activities forwarded each calendar month to the Assistant Chief Engineer-Power Plant Engineering.

6.2.4 SHIFT TECHNICAL ADVISOR

The Shift Technical Advisor function is to provide on shift advisory technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS-3.1-1978 as endorsed by Regulatory Guide 1.8, September 1975 (reissued May 1977), except for the (1) Health Physics Supervisor who shall meet

*Not responsible for sign-off function.



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SAFETY EVALUATION

The changes to Table 6.2-1 of Unit 1 and Unit 2 Technical Specifications are an expected evolution of the STA concept, as evidenced by statements in both NUREG 0660 and NUREG 0737 and by FPL's response to item I.A.1.1. of NUREG 0737 (L-81-4, 1/2/81), and not a change in the intent of the Technical Specifications. The Draft Commission Policy Statement on Engineering Expertise on Shift as published in the Federal Register July 25, 1983, allows licensees to combine the Senior Reactor Operator and Shift Technical Advisor functions.

As noted above, the NRC has always stated that the separate STA was an interim concept with a desired goal of upgrading one or more on-shift SROs to meet the STA requirements. This has also been a goal at the St. Lucie site. We are now in a position to implement this concept in the fairly near future. In fact, the only items preventing full implementation are the present Technical Specifications. Note that the Unit 1 and Unit 2 Technical Specification requirements for STA training and education (which are also described in the FSAR and NUREG 0843 - SER for Unit 2) are not being modified and continue to apply to the STA or SRO-STA so the on-shift technical expertise is not adversely affected by the proposed change.

We do wish to retain the option of using separate STAs to allow maximum flexibility in both shift manning and handling possible personnel retention problems.

The related change to Figure 6.2-2 essentially involves a title change for an existing position in the operations (on-shift) organization. The old Watch Engineer title which was for the SRO "shift foreman" is being changed to Assistant (Nuclear) Plant Supervisor, who also must be an SRO. This position will now become supervisory/management in nature more so than the old Watch Engineer/Shift Foreman position. The Unit 2 Shift Supervisor title is changed to Nuclear Plant Supervisor to be consistent with the Unit 1 specification, and the title actually used at the plant.

For the above reasons the proposed changes do not involve an unreviewed safety questions per 10 CFR 50.59 nor do they involve a significant hazard per 10 CFR 50.91(a)(1).