

ATTACHMENT 1

Marked-up St. Lucie Unit 1 Technical Specification Pages:

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6-12

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6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

FUNCTION

6.5.2.1 The Company Nuclear Review Board shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

~~6.5.2.2 The CNRB shall be composed of the following members:~~

- ~~Member: Group Vice President~~
- ~~Member: Senior Vice President - Nuclear~~
- ~~Member: Vice President - Engineering, Projects & Construction~~
- ~~Member: Vice President - Nuclear Energy~~
- ~~Member: Director - Nuclear Licensing~~
- ~~Member: Director - Quality Assurance~~
- ~~Member: Chief Engineer - Power Plant Engineering~~
- ~~Member: Manager - Nuclear Energy Services~~
- ~~Member: Manager - Nuclear Fuel~~
- ~~Member: Manager - Power Plant Engineering~~

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~~The Chairman shall be a member of the CNRB and shall be designated in writing.~~

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the CNRB Chairman to serve on temporary basis; however, no more than two alternates shall participate as voting members in CNRB activities at any one time.



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6.5.2.2 The Executive Vice President shall appoint at least ten members to the CNRB and shall designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit in the areas listed in Specification 6.5.2.1. All members shall have at least a Bachelor's degree in engineering, related sciences or equivalent experience per ANSI/ANS - 3.1 - 1978 as endorsed by Regulatory Guide 1.8, September 1975 (reissued May 1977), Section 4.1, and at least 5 years of cumulative professional level experience in one or more of the fields listed in Specification 6.5.2.1. The Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the CNRB in review of complex problems beyond the scope of the CNRB's expertise. The Chairman shall have at least 6 years of professional level management experience in the nuclear power field.

## ADMINISTRATIVE CONTROLS

### AUTHORITY

6.5.2.9 The CNRB shall report to and advise the Executive Vice President on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

### RECORDS

6.5.2.10 Records of CNRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each CNRB meeting shall be prepared, approved and forwarded to the Executive Vice President within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Executive Vice President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Executive Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of the review shall be submitted to the CNRB, and the Senior Vice President - Nuclear.

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President - Nuclear and the ~~CNRB~~ shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the FRG. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.

CNRB



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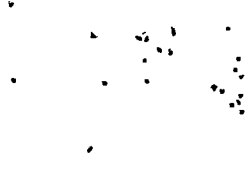
ATTACHMENT 2

Marked-up St. Lucie Unit 2 Technical Specification Pages

6-1

6-6

6-10 (plus insert)





## ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY


6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor, or during his absence, from the control room, a designated individual, shall be responsible for the control room command function. A management directive to this effect, signed by the Senior Vice President - Nuclear, shall be reissued to all station personnel on an annual basis.

### 6.2 ORGANIZATION

#### ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3). 
- b. The Senior Vice President - Nuclear shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.
- c. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
- e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the health physics manager shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.



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## 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 <sup>Bachelor's</sup> bachelor 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.

Site Vice President - St. Lucie Plant

Bachelor's

Site Vice President -  
St. Lucie Plant

Site Vice President - St. Lucie Plant

Site Vice President -  
St. Lucie Plant



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THE STATE OF TEXAS,

COUNTY OF DALLAS,

BEFORE ME, the undersigned authority, on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

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ADMINISTRATIVE CONTROLS

FUNCTION (Continued)

- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

~~6.5.2.2 The CNRB shall be composed of the following members:~~

- ~~Member: Group Vice President~~
- ~~Member: Senior Vice President - Nuclear~~
- ~~Member: Vice President - Engineering, Projects & Construction~~
- ~~Member: Vice President - Nuclear Energy~~
- ~~Member: Director - Nuclear Licensing~~
- ~~Member: Director - Quality Assurance~~
- ~~Member: Chief Engineer - Power Plant Engineering~~
- ~~Member: Manager - Nuclear Energy Services~~
- ~~Member: Manager - Nuclear Fuel~~
- ~~Member: Manager - Power Plant Engineering~~

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~~The Chairman shall be a member of the CNRB and shall be designated in writing.~~

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the CNRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the CNRB Chairman to provide expert advice to the CNRB.

MEETING FREQUENCY

6.5.2.5 The CNRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter and as convened by the CNRB Chairman or his designated alternate.

QUORUM

6.5.2.6 The ~~quorum~~ of the CNRB necessary for the performance of the CNRB review and audit functions of these Technical Specifications shall consist of the Chairman and his designated alternate and at least four CNRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

quorum

or

6.5.2.2 The Executive Vice President shall appoint at least ten members to the CNRB and shall designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit in the areas listed in Specification 6.5.2.1. All members shall have at least a Bachelor's degree in engineering, related sciences or equivalent experience per ANSI/ANS - 3.1 - 1978 as endorsed by Regulatory Guide 1.8, September 1975 (reissued May 1977), Section 4.1, and at least 5 years of cumulative professional level experience in one or more of the fields listed in Specification 6.5.2.1. The Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the CNRB in review of complex problems beyond the scope of the CNRB's expertise. The Chairman shall have at least 6 years of professional level management experience in the nuclear power field.

## ATTACHMENT 3

### Safety Analysis

#### Introduction

These proposed license amendments are intended to make corrections to typographical errors in the Administrative Controls, delete the Company Nuclear Review Board (CNRB) specific composition list and replace it with a general statement defining the requisite level of expertise for membership, and revise the Independent Safety Engineering Group (ISEG) reporting and administrative requirements (St. Lucie Unit 2 only).

#### Discussion

##### o Typographical Errors

#### St. Lucie Unit 1

Specification 6.7.1 a. on page 6 - 12 has a typographical error in the last line; "CNBR" should read "CNRB".

#### St. Lucie Unit 2

Specification 6.2.1 a. on page 6 - 1 has a typographical error in the first line; "communcation" should read "communication".

Specification 6.2.3.2 on page 6 - 6 has a typographical error in the fourth line; "bachelor" should read "Bachelor's".

Specification 6.5.2.6 on page 6 - 10 has a typographical error in the first line; "quorum" should read "quorum". Additionally, the statement "...shall consist of the Chairman and his designated alternate..." should read "...shall consist of the Chairman or his designated alternate...".

By proposed license amendment request L-87-145, dated March 31, 1987, FPL requested various administrative changes to the St. Lucie Unit 2 Technical Specifications. On October 23, 1987, by Amendment No. 25 to St. Lucie Unit 2 Operating License NPF-16, the NRC issued the requested amendment. However, in issuing the amendment, two typographical errors resulted - the mis-spelling of "quorum" and "and" being replaced for "or". It should be noted that the similar specification for St. Lucie Unit 1, Specification 6.5.2.6, states "...shall consist of the Chairman or his designated alternate...".

##### o Company Nuclear Review Board (CNRB) Composition

#### St. Lucie Units 1 and 2

Specification 6.5.2.2 in both Units' Technical Specifications lists by title the ten members of the CNRB. This list requires revision each time an organizational

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change occurs or when the titles of CNRB members are changed. In fact, this Specification of the St. Lucie Unit 1 Technical Specifications has been revised 5 times in the last 12 years and the St. Lucie Unit 2 Technical Specification has been revised 3 times in the last 5 years. Another change to both Units' Technical Specifications is now required. These changes result in the expenditure of FPL and NRC staff resources for processing license amendments which have no effect on plant safety.

To obviate the need for future amendments to the CNRB composition resulting from organizational or title changes, FPL proposes to delete the specific composition list for the CNRB and replace it with a statement defining the composition of the CNRB and specifying the requisite level of technical, operational, and nuclear management expertise for CNRB membership.

This statement requires the FPL Executive Vice President to appoint at least ten members to the CNRB and designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit of designated activities in the following areas, as listed in the Technical Specifications:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

All members shall have at least a Bachelor's degree in engineering, related sciences or equivalent experience per ANSI/ANS - 3.1 - 1978 as endorsed by Regulatory Guide 1.8, September 1975 (reissued May 1977), Section 4.1, and at least 5 years of cumulative professional level experience in one or more of the fields listed in Specification 6.5.2.1. The Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the CNRB in review of complex problems beyond the scope of the CNRB's expertise. The Chairman shall have at least 6 years of professional level management experience in the nuclear power field.

This proposal is consistent with recent NRC practice in defining requirements in the Technical Specifications for Near Term Operating Licenses (NTOLs) for the offsite corporate overview committee. The paragraph which is proposed to replace the CNRB composition list ensures that there will be no reduction in the collective talents of the CNRB and that the quality and scope of independent review will be maintained.

#### St. Lucie Unit 2

The St. Lucie Unit 2 Technical Specifications, Specification 6.2.3.3 currently requires, "The ISEG shall make detailed recommendations ... to the Assistant Chief Engineer - Power Plant Engineering".



"Clarification of TMI Action Plan Requirements", NUREG-0737, November, 1980, Item I.B.1.2, "Independent Safety Engineering Group" discusses the establishment of an onsite Independent Safety Engineering Group (ISEG) intended to perform independent review of plant operations. NUREG-0737 further discusses that the principal function of the ISEG is to examine plant operating characteristics, NRC issuances, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG is intended to perform independent review and audits of plant activities including maintenance, modifications, operational problems, and operational analysis, and aid in the establishment of programmatic requirements for plant activities. Where useful improvements can be achieved, it is expected that this group would develop and present detailed recommendations to corporate management for such things as revised procedures or equipment modifications.

Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable. ISEG will then be in a position to advise utility management on the overall quality and safety of operations. ISEG is not required to perform detailed audits of plant operations and is not responsible for sign-off functions such that it becomes involved in the operating organization.

The St. Lucie Unit 2 ISEG is located onsite and currently, as required by NUREG-0737, reports offsite to an FPL official in a high level, technically oriented position that is not in the management chain for power production, i.e., the Assistant Chief Engineer - Power Plant Engineering.

On September 1, 1988, FPL implemented organizational changes to include the nuclear plant engineering function within the Nuclear Energy Department. As a result of these organizational changes, the position of Assistant Chief Engineer - Power Plant Engineering was eliminated from the nuclear organization line responsibility. The ISEG currently reports to the Manager Nuclear Engineering Technical (the Nuclear Energy Department position most closely resembling the level of responsibility of the prior Assistant Chief Engineer - Power Plant Engineering). FPL now proposes an alternative approach to TMI Item I.B.1.2 to meet the intent of safety oversight. This proposed change is discussed below.

The ISEG is responsible for independent review of a variety of topics, as discussed above, not all of which are under the direct control of the nuclear engineering corporate staff organization, e.g., plant operations, maintenance, operational analysis, etc. As a result, the reporting responsibility of the ISEG is more broadly based than purely "engineering" related issues and encompasses diverse nuclear topics from maintenance to fuels to chemistry and radiation controls. As a result, since the ISEG produces a product which is more wide ranging than solely engineering related topics, it is logical that the customer of this organization make use of the ISEG's product from an integrated nuclear safety viewpoint.

FPL's nuclear power plant responsibility is stated in Technical Specification 6.1.1:

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"The Plant Manager shall be responsible for overall unit operation..."

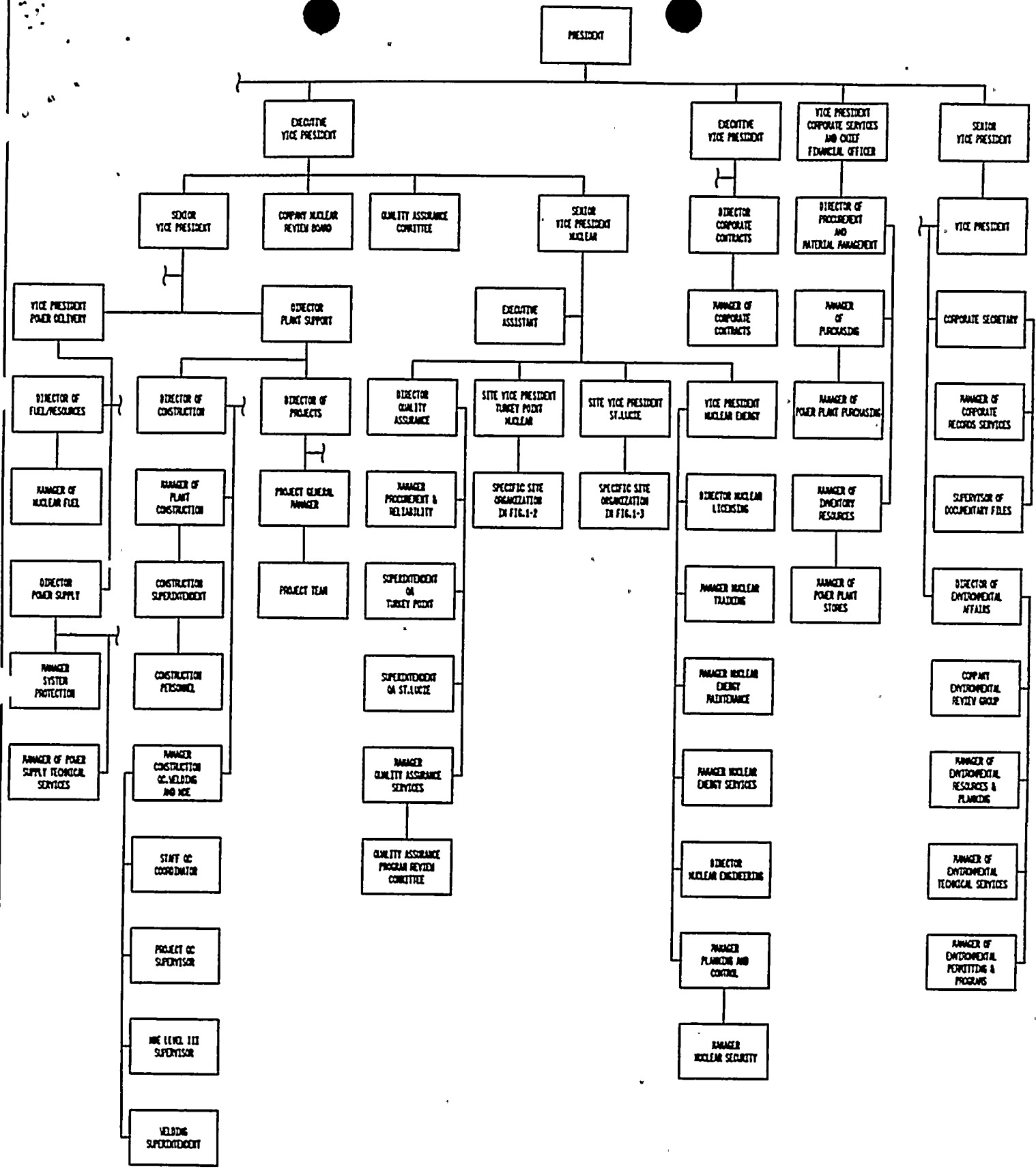
Additionally, Specification 6.2.1 c. states:

"The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant".

FPL's Nuclear Energy organization is discussed in FPL's "Topical Quality Assurance Report" (TQAR). The Nuclear Energy Department is responsible for the operation, maintenance, refueling and modification of St. Lucie Unit 2 in accordance with written and approved procedures. FPL's nuclear organization structure is shown in TQAR Figure 1-1 (attached). The Site Vice President - St. Lucie is accountable for the operation, maintenance, and modification of St. Lucie Plant. He acts as liaison between St. Lucie Plant and the corporate nuclear energy organization.

Since the Plant Manager is "... responsible for overall unit safe operation..." and has "... control over those onsite resources necessary for safe operation and maintenance..." his responsibility, as indicated in Figure 1-1 confirms him as FPL's line manager for St. Lucie Unit 2. While assigned to the site, and physically located there, the Site Vice President - St. Lucie can be seen to be in an oversight mode for safe operation and maintenance of the unit. This position makes him uniquely qualified to receive the reports of the ISEG. His day-to-day presence at the site puts him in the best position to appreciate all aspects of the independent examination of plant operating characteristics, NRC issuances, and other appropriate sources of plant design and operating experience information that may indicate opportunities for further enhancing plant safety.

As a result, it is proposed that Specification 6.2.3.2 be revised to require non-degreed candidates for the ISEG be approved by the Site Vice President - St. Lucie prior to joining the group; that Specification 6.2.3.3 be revised to require the ISEG to make its detailed recommendations to the Site Vice President - St. Lucie; that Specification 6.2.3.4 be revised to delete "offsite" and to require the ISEG to report to the Site Vice President - St. Lucie; and that Specification 6.2.3.5 be revised to require ISEG activity reports be forwarded to the Site Vice President - St. Lucie each calendar month.



TOPICAL QUALITY ASSURANCE REPORT	
ORGANIZATION OF DEPARTMENTS AFFECTING QUALITY CASE 84122021.NCI FIGURE 1-1 APPENDIX A	REV. 1.4 DATE 11-0-77-M PAGE 1 OF 1

ATTACHMENT 4

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulations, 10 CFR 50.92, which states that no significant hazards considerations are involved if the operation of the facility in accordance with the proposed amendment would 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. Each standard is discussed as follows:

- (1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative in nature and do not affect assumptions contained in the safety analyses nor do they affect Technical Specifications that preserve safety analysis assumptions. Additionally, these changes do not modify the physical design and/or operation of the plant. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

- (2) Use of the modified specification would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed are administrative in nature and will not lead to material procedural changes or to physical modifications to the facility. Therefore, the proposed changes do not create the possibility of a new or different kind of accident.

- (3) Use of the modified specification would not involve a significant reduction in a margin of safety.

The changes being proposed are administrative in nature and do not relate to or modify the safety margins defined in or required and maintained by the Technical Specifications.

The typographical corrections proposed do not affect any margin of safety. The deletion of the composition list of Company Nuclear Review Board (CNRB) membership and replacement with qualifications requirements guidelines will not decrease the effectiveness of this organization's independent review scope nor will there be a reduction in the collective talents of the CNRB.

The changes proposed to the Independent Safety Engineering Group (ISEG) administrative control and reporting requirements will focus the control, reports and reporting requirements of the ISEG to the Site Vice President - St. Lucie, Florida Power & Light Company (FPL) and thus ensure the most efficient and effective use of the ISEG's products. However, changing the administrative control and reporting requirements will not affect any margin of safety.

Based on the above, we have determined that the proposed amendment does not (1) involve significant increase in the probability of consequences of an accident previously evaluated, (2) create the probability of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazard consideration.