

ATTACHMENT 1

Insert, p 6-9, St. Lucie Unit 1 Technical Specifications  
Insert, p 6-10, St. Lucie Unit 2 Technical Specifications

- 6.5.2.2 The Executive Vice President shall appoint, in writing, a minimum of five 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. The Chairman shall meet the requirements of ANSI/ANS-3.1-1987, Section 4.7.1. The members of the CNRB shall meet the educational requirements of the ANSI/ANS-3.1-1987, Section 4.7.2, and have at least 5 years of professional level experience in one or more of the fields listed in Specification 6.5.2.1. CNRB members who do not possess the educational requirements of ANSI/ANS-3.1-1987, Section 4.7.2 (up to a maximum of 2 members) shall be evaluated, and have their membership approved and documented, in writing, on a case-by-case basis by the Executive Vice President, considering the alternatives to educational requirements of ANSI/ANS-3.1-1987, Sections 4.1.1 and 4.1.2.

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## ATTACHMENT 2

### **SAFETY ANALYSIS**

#### INTRODUCTION

Specification 6.5.2.2 of both the St. Lucie Units 1 and 2 Technical Specifications list, by title, the members of the Company Nuclear Review Board (CNRB). This list requires revision each time an organizational change occurs or when the titles of CNRB members change. FPL proposes to delete the specific composition list for the CNRB from the Technical Specifications and replace it with a statement defining the requirements for membership. Additionally, FPL proposes to require a minimum membership of five members. This will permit FPL to adjust the CNRB membership, as required, to address organizational changes while retaining the most experienced individuals on the CNRB.

#### DISCUSSION

Specification 6.5.2.2 in both the St. Lucie Unit 1 and Unit 2 Technical Specifications lists, by title, the ten members of the CNRB. These lists require revision each time an organization change occurs or when the titles of CNRB members are changed. In fact, this Specification has been revised 5 times in the last 13 years for St. Lucie Unit 1 and 3 times in the last 6 years for St. Lucie Unit 2. 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 also requires the FPL Executive Vice President to appoint a minimum of five 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 Technical Specification 6.5.2.1:

- 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



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All members of the CNRB shall meet the educational requirements of ANSI/ANS-3.1-1987 standard "Selection, Qualification and Training of Personnel for Nuclear Power Plants", Section 4.7.2 and have at least 5 years of professional level experience in one or more of the fields listed in Specification 6.5.2.1. Proposed CNRB members who do not possess the educational requirements of Section 4.7.2 of ANSI/ANS-3.1-1987 (up to a maximum of two members) shall have their membership reviewed, on a case-by-case basis by the Executive Vice President, considering the alternatives to educational requirements of Sections 4.1.1 and 4.1.2 of ANSI/ANS 3.1-1987. The Chairman of the CNRB (who will also be designated in writing) shall meet the requirements of Section 4.7.1 of ANSI/ANS-3.1-1987.

The CNRB will have a minimum of five members per proposed Specification 6.5.2.2 and current Specification 6.5.2.6. Specification 6.5.2.6, Quorum, is the Technical Specification limitation on the required minimum number of members necessary for the performance of the CNRB review and audit functions. The quorum is, and will continue to be, the CNRB Chairman (or his designated alternate) and at least four CNRB members, including alternates.

The CNRB membership is proposed to be at least five members so as to permit the Executive Vice President to draw upon and assign to the CNRB the most experienced individuals. FPL's minimum CNRB composition proposal is consistent with the NRC's licensing requirements for the independent review organizations of several near term operating licenses. This revision to the Technical Specifications will provide FPL with the required flexibility to implement organizational modifications within the limitations of Specification 6.2, Onsite and Offsite Organization. Future revisions to FPL's Nuclear Energy Department are envisioned to incorporate, within the charter of the CNRB, increased responsibility and oversight. The CNRB membership will draw upon a more senior and more experienced pool of individuals (i.e., a more restricted fraternity of members). These individuals will provide the necessary cumulative experience in the fields of Specification 6.5.2.1 and will further enhance the CNRB's already significant review and audit function.

The focusing of the CNRB membership designation authority with the Executive Vice President, the referenced educational and experience requirements of ANSI/ANS-3.1-1987, as well as the flexibility to restrict the required membership will result in no reduction in the collective talents of the CNRB. In fact, FPL envisions an improvement in the already high level of quality and scope of CNRB independent audit and review.



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