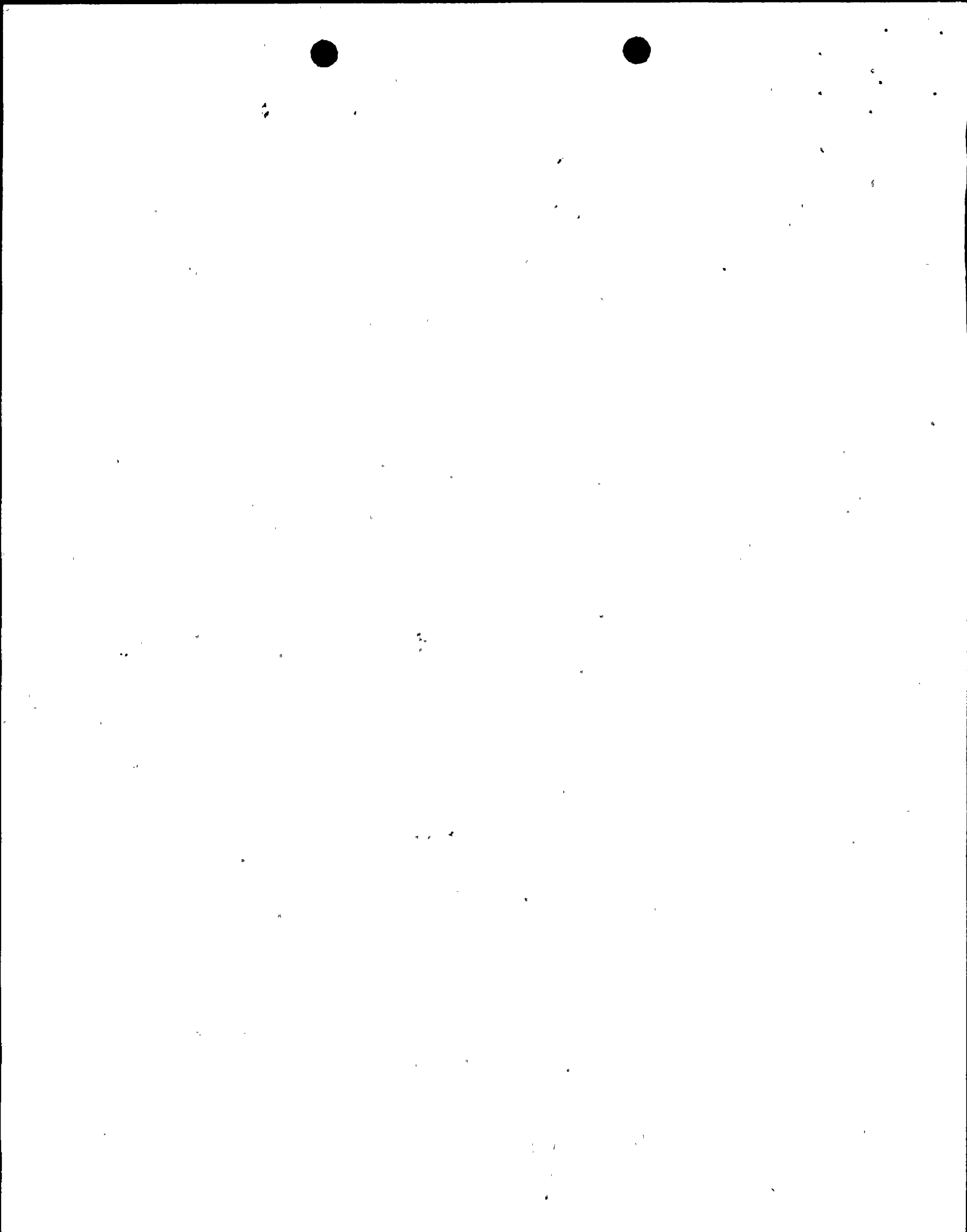


ATTACHMENT 1

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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 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.



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ATTACHMENT 2

Safety Analysis

Introduction

This proposed license amendment is intended to revise the Independent Safety Engineering Group (ISEG) reporting and administrative requirements.

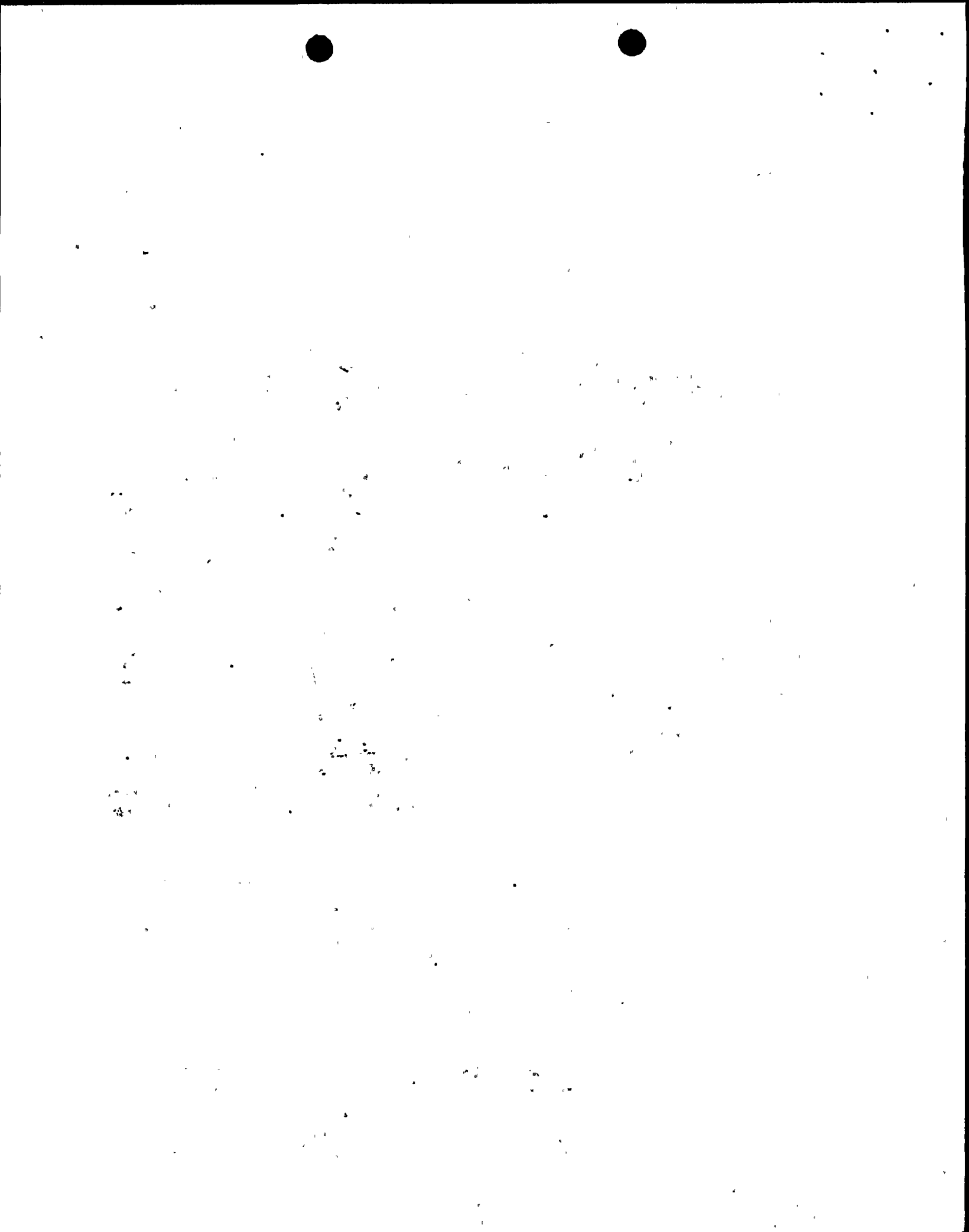
Discussion

"Clarification of TMI Action Plan Requirements", NUREG-0737, November, 1980, Item I.B.1.2, "Independent Safety Engineering Group" discussed the establishment of an onsite Independent Safety Engineering Group (ISEG) intended to perform independent review of plant operations. NUREG-0737 further discusses that the principle 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 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 and the St. Lucie Unit 2 Technical Specifications, 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.

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. 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



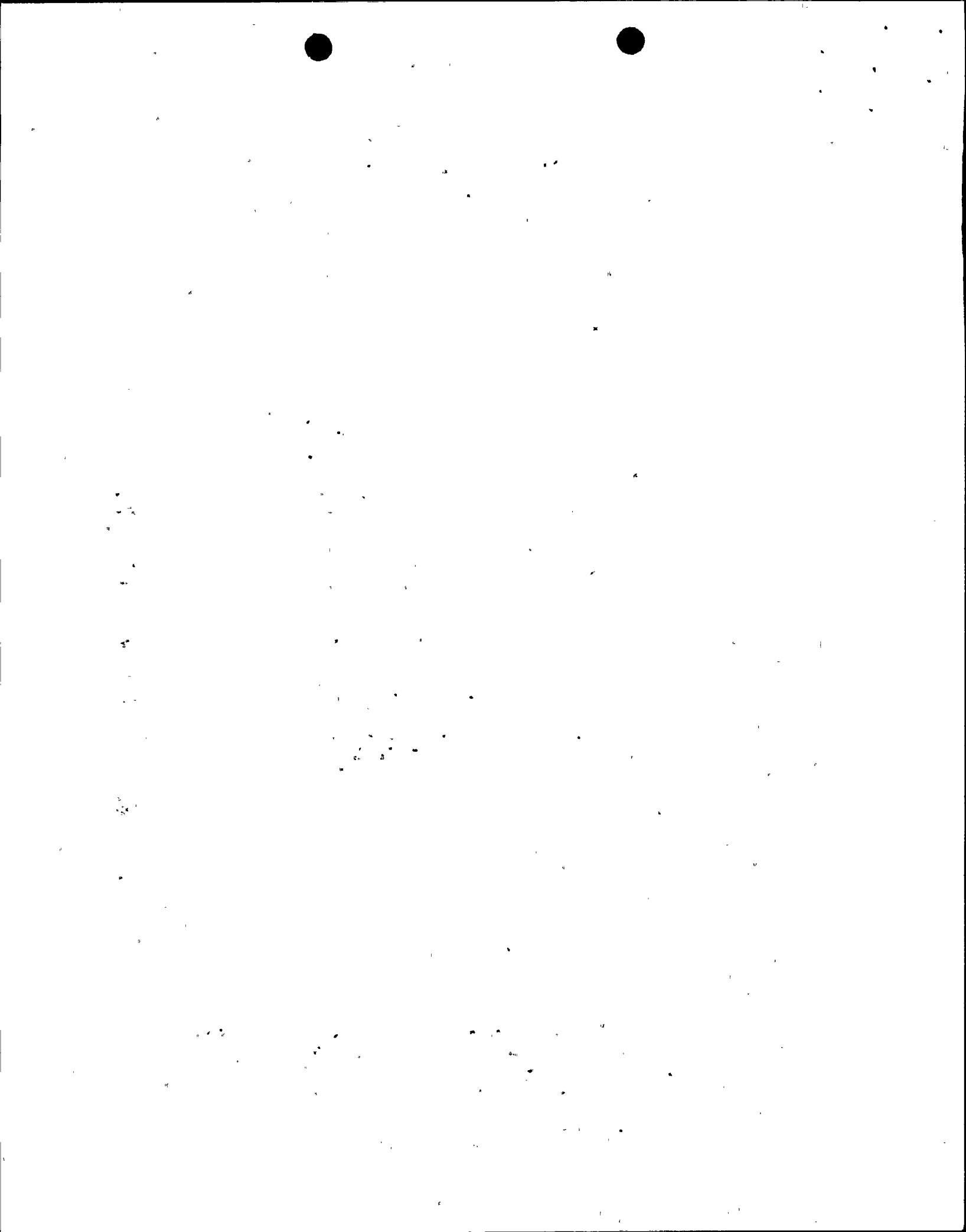
proposes an alternative approach to TMI Item I.B.1.2 to better meet the intent of safety oversight. This proposed change is discussed below.

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 oversight responsibility of the ISEG is more broadly based than purely "engineering" related issues and encompasses diverse nuclear topics from maintenance to operations 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 recipient of products from this organization make use of the ISEG's product from an integrated nuclear safety viewpoint.

FPL's newly established Nuclear Division maintains control of, and responsibility for, nuclear power plant design, preoperational and start-up testing, operation, maintenance, refueling, and modification of FPL's nuclear power plants in accordance with written and approved procedures. The President, Nuclear Division, has overall responsibility for the Nuclear Division's activities. The organization of FPL's Nuclear Division is presented in Figure 1.

As can be seen in Figure 1, reporting to the President, Nuclear Division, are the Vice President Nuclear Assurance and Company Nuclear Review Board, among others. The Vice President Nuclear Assurance is responsible for the selection, technical direction, administrative control, staffing, training and development of personnel required for supervisory and operating continuity of the Quality Assurance Department, Nuclear Safety Speakout Group and the Chairman, Company Nuclear Review Board (CNRB) (for administrative support only). The Vice President Nuclear Assurance also initiates QA Program policy changes when necessary. In addition, the Vice President Nuclear Assurance is responsible for selecting a team independent of the Quality Assurance Department to perform periodic audits of the Quality Assurance Department. The results of these audits are presented to the Vice President Nuclear Assurance and the CNRB.

The CNRB reports to and advises the President Nuclear Division/Executive Vice President on those areas of responsibility as specified in Sections 6.5.2.7 and 6.5.2.8 of the Technical Specifications. The CNRB is comprised of executive level members of management with responsibilities for the execution of the Quality Assurance Program. The CNRB reviews, or directs the performance of reviews of, activities concerning the technical aspects of the operating nuclear power plant insofar as they impact on plant safety, the health and safety of the public, and laws, regulations and licensing commitments. In addition, audits of these areas are performed under the cognizance of the CNRB.



The CNRB composition is described in Section 6.0 of each facility's Technical Specifications. Subjects within the purview of the CNRB are also listed in the appropriate plant Technical Specifications. The CNRB has the authority to carry out its responsibilities by way of written action letters, verbal directions, meeting minutes or appointed subcommittees. When necessary, the CNRB may use consultants to perform required reviews.

The CNRB is responsible for reviewing and evaluating Quality Assurance Program activities. Quality Assurance Program status reports are periodically prepared by the Quality Assurance Department and routed to members of the CNRB for review. CNRB meetings are held by the Chairman to keep members apprised of conditions, including significant problems, that require management attention.

The individual designated as Chairman, CNRB, meets the requirements of American National Standard ANSI/ANS-3.1-1987, Section 4.7.1, Supervisor or Chairman of Standing Committee Responsible for Independent Review. This standard requires that the Chairman, CNRB, have, among other qualifications, a Baccalaureate in engineering or related science and a minimum professional level managerial experience in the power field of six years. Additionally, ANSI/ANS-3.1-1987 requires that the Chairman, CNRB, have the necessary overall nuclear background to determine when there is need for additional expertise to examine a particular area or activity.

As a result of the organizational placement, authority, and qualifications of the Chairman, CNRB, he is uniquely qualified to review the reports of the ISEG. His day-to-day activities put 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.

Additionally, Technical Specification 6.2.3.2 currently requires that, for the ISEG, "No more than two members shall be assigned from any one department". This requirement was based on the fact that ISEG members were temporarily assigned to the ISEG from other FPL departments for fixed periods of time (i.e., one year) on a rotational assignment basis. As proposed, ISEG will be, administratively, a part of the Nuclear Assurance Department and report to the Chairman, CNRB. As a result, the ISEG members will be organizationally and permanently assigned to that department thus obviating the need for the above discussed caveat.

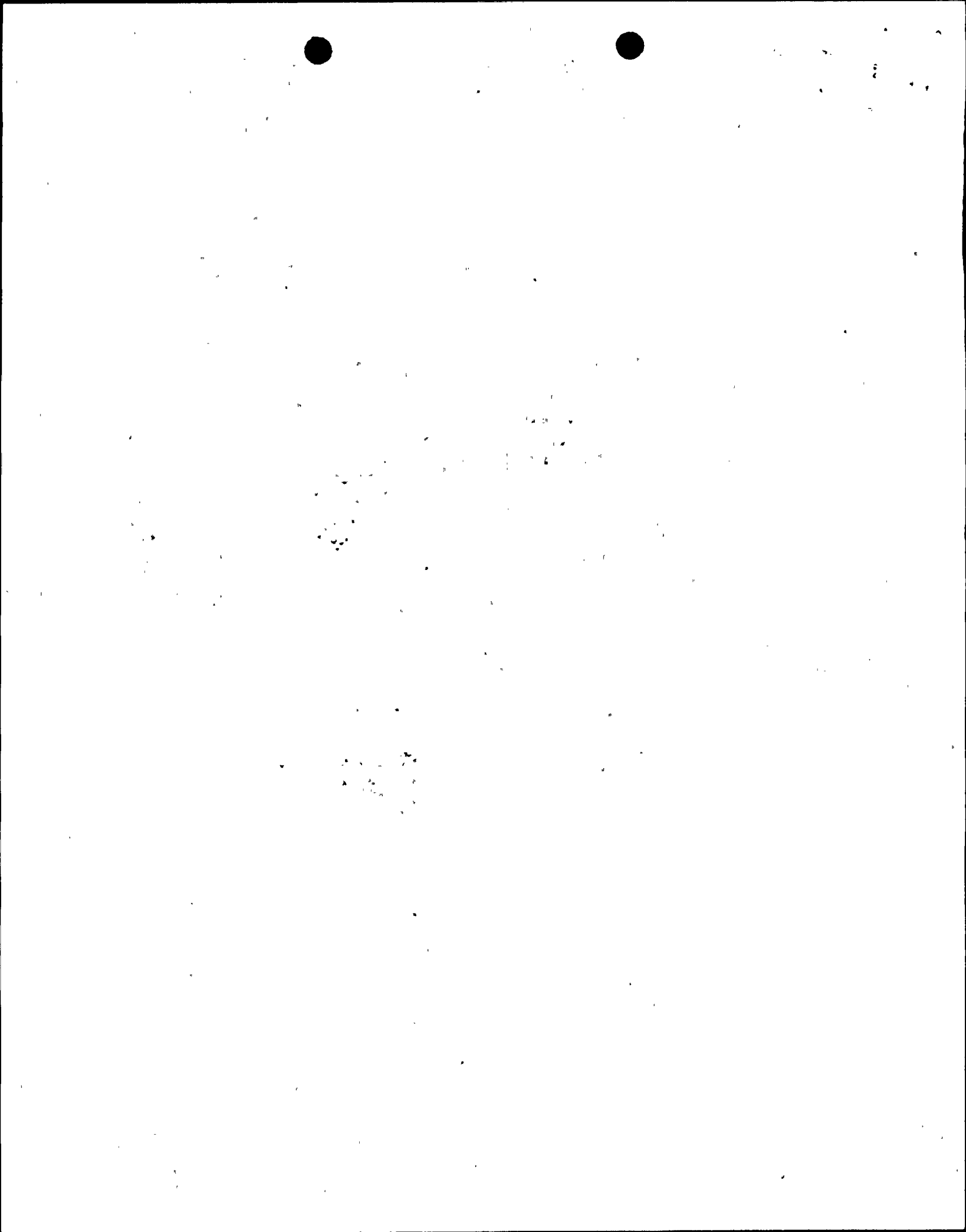
It is proposed that Specification 6.2.3.2 be revised to require non-degreed candidates for the ISEG be approved by the Chairman, CNRB, prior to joining the group and that the sentence "No more than two members shall be assigned from any one department" be deleted; that Specification 6.2.3.3 be revised to require the ISEG to make its detailed recommendations to the Chairman, CNRB; that Specification 6.2.3.4 be revised to require that ISEG report to the



Chairman, CNRB; and that Specification 6.2.3.5 be revised to require ISEG activity reports be forwarded to the Chairman, CNRB each calendar month.



Figure 1
Florida Power & Light Company
Nuclear Division Organization



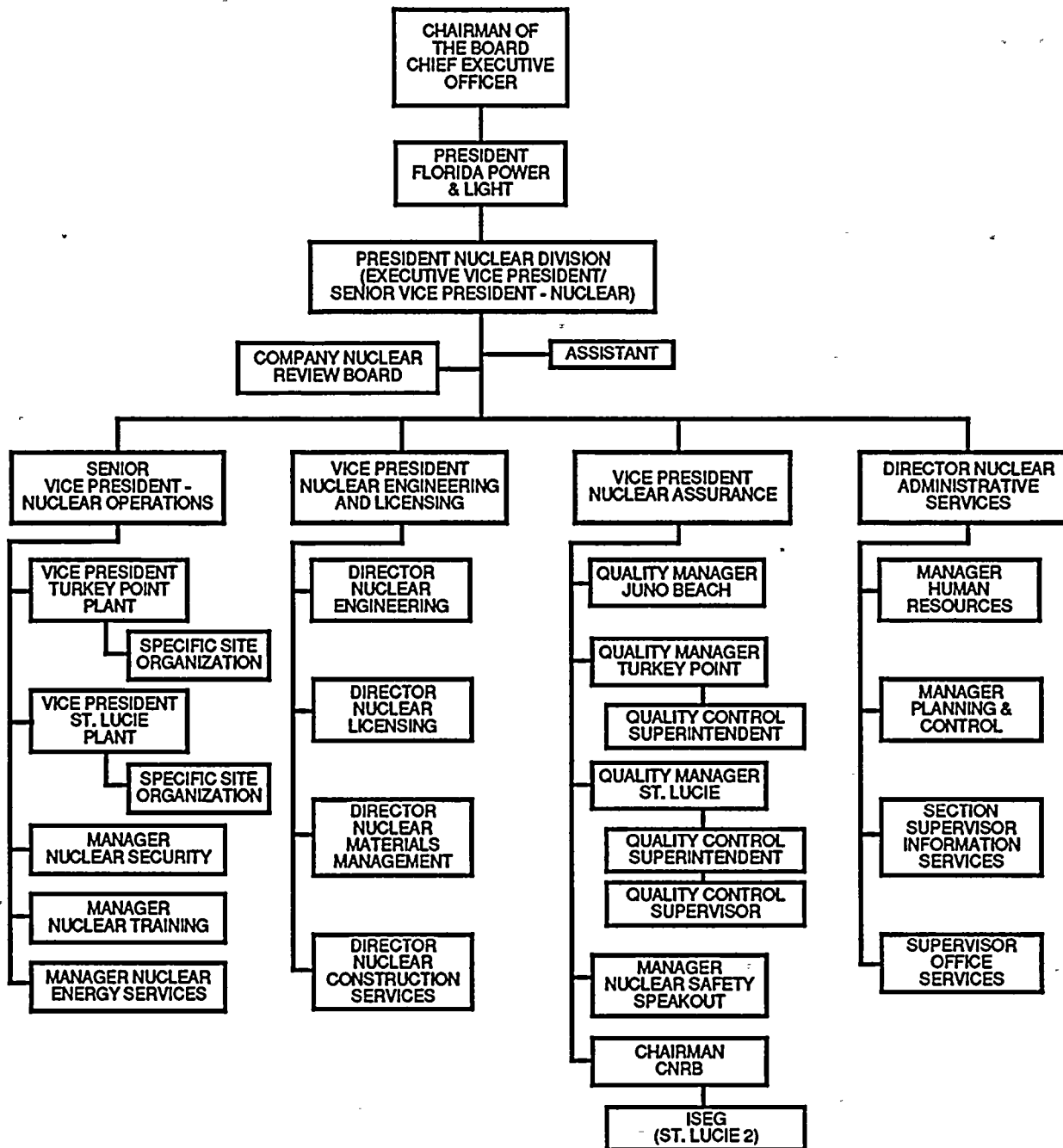


FIGURE 1

ATTACHMENT 3

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The standard 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 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.

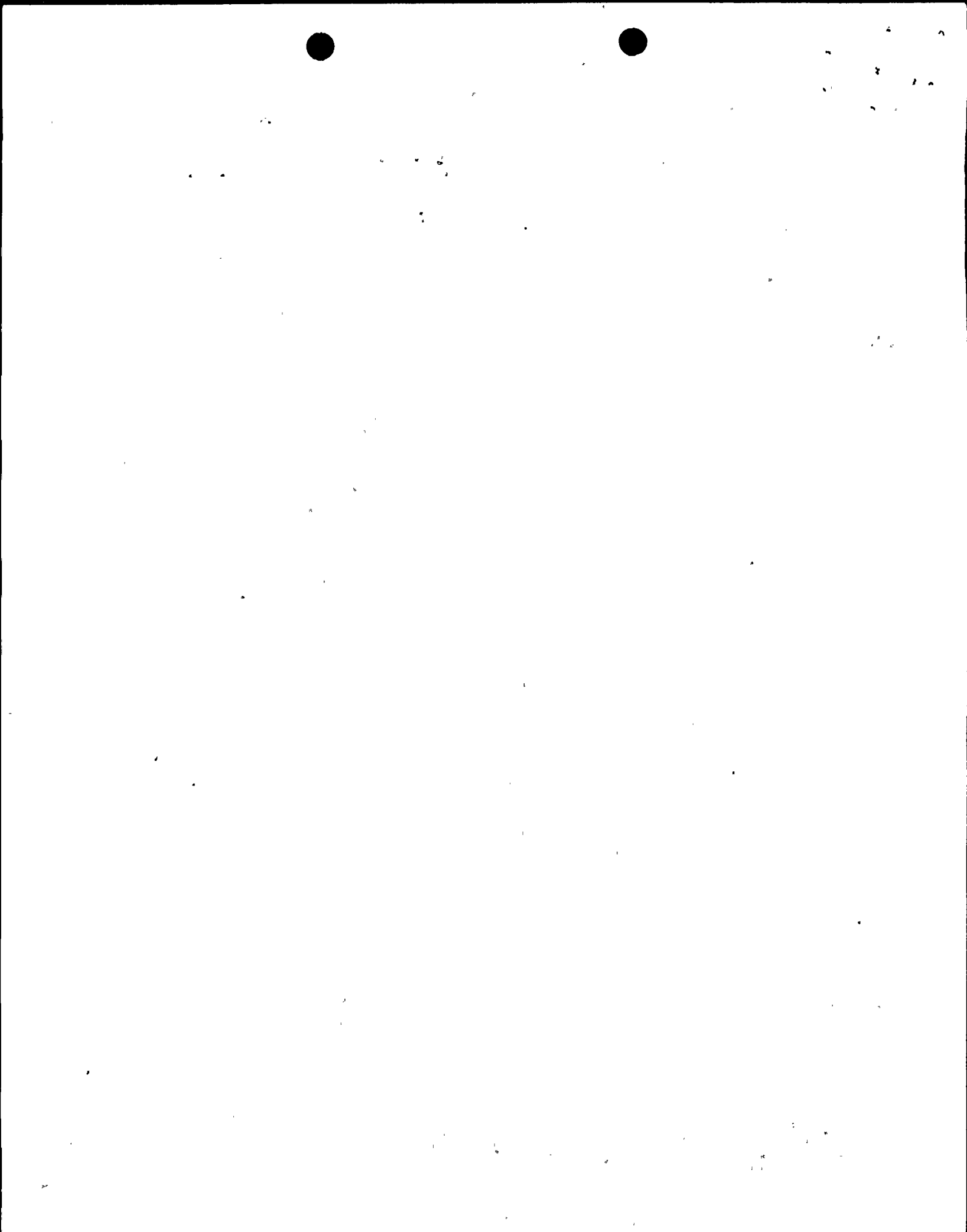
- (2) Use of the modified specification would not create the possibility of a new or different kind of accident from any accident previously evaluated.

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 changes proposed amend the Independent Safety Engineering Group (ISEG) administrative control and reporting requirements and will focus the control, reports and reporting requirements of the ISEG to the Chairman, Company Nuclear Review Board. Florida Power & Light Company (FPL) will 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 hazards consideration.

