6.0 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~~ Corporate Nuclear Officer 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. This 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~~ Corporate Nuclear Officer 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.

ALTERNATES

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

MEETING FREQUENCY

6.5.1.4 The FRG shall meet at least once per calendar month and as convened by the FRG Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the FRG necessary for the performance of the FRG responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Facility Review Group shall be responsible for:

a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to Appendix A Technical Specifications.

d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior ~~Vice President - Nuclear~~, and to the Chairman of the Company Nuclear Review Board.

Corporate Nuclear Officer

f. Review of all REPORTABLE EVENTS.

g. Review of unit operations to detect potential nuclear safety hazards.

h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant Manager or the Company Nuclear Review Board.

i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

k. Review of every unplanned on-site release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer and to the Company Nuclear Review Board.

l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL and RADWASTE TREATMENT SYSTEMS.

m. Review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last FRG meeting.

AUTHORITY

6.5.1.7 The Facility Review Group shall:

a. Recommend in writing to the Plant Manager, approval or disapproval of items considered under Specifications 6.5.1.6.a through d above.

b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6 a through e above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer and the Company Nuclear Review Board of disagreement between the FRG and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

RECORDS

6.5.1.8 The Facility Review Group shall maintain written minutes of each FRG meeting that, at a minimum, document the results of all FRG activities performed under the responsibility and authority provisions of these Technical Specifications. Copies shall be provided to the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer and the Chairman of the Company Nuclear Review Board.

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. mechnical and electrical engineering

h. quality assurance practices

COMPOSITION

6.5.2.2. The ~~Executive Vice President~~ Senior Corporate Nuclear Officer 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~~ Senior Corporate Nuclear Officer, considering the alternatives to educational requirements of ANSI/ANS-3.1-1987, Sections 4.1.1 and 4.1.2.

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.

g. All REPORTABLE EVENTS.

h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

i. Reports and meeting minutes of the Facility Review Group.

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the CNRB. These audits shall encompass:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

b. The performance, training and qualifications of the entire unit staff at least once per 12 months.

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.

d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months.

e. Any other area of unit operation considered appropriate by the CNRB or the ~~Executive Vice President.~~ Senior Corporate Nuclear Officer

f. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.

g. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.

h. The radiological environmental monitoring program and the results thereof at least once per 12 months.

i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

j. The PROCESS CONTROL PROGRAM and implementing procedures for dewatering of radioactive bead resin at least once per 24 months.

AUTHORITY

6.5.2.9 The CNRB shall report to and advise the ~~Executive Vice President~~ Senior Corporate Nuclear Officer on those areas of responsibility ~~specifed~~ 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~~ Senior Corporate Nuclear Officer within 14 days following each meeting.

b. Reports of reviews encompassed by Specification 6.5.2.7 above, shall be prepared, approved and forwarded to the ~~Executive Vice President~~ Senior Corporate Nuclear Officer 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~~ Senior Corporate Nuclear Officer 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~~ Corporate Nuclear Officer.

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~~ Corporate Nuclear Officer 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.

c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer within 14 days of the violation.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG-0737.

b. Refueling operations.

c. Surveillance and test activities of safety related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Control Program for effluent monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974.

j. Quality Control Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Each procedure of Specification 6.8.1a through i. above, and changes thereto, shall be reviewed by the FRG and shall be approved by the Plant Manager prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1a through i. above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

ATTACHMENT 2

Marked-Up Technical Specification Pages,

St. Lucie Unit 2:

6-1
6-8
6-9
6-10
6-12
6-13

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.

Corporate Nuclear officer

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).

Corporate Nuclear officer

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.

MEETING FREQUENCY

6.5.1.4 The FRG shall meet at least once per calendar month and as convened by the FRG Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the FRG necessary for the performance of the FRG responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Facility Review Group shall be responsible for:

a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to Appendix A Technical Specifications.

d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Senior ~~Vice-President - Nuclear~~ and to the Chairman of the Company Nuclear Review Board.

Corporate Nuclear Officer

f. Review of all REPORTABLE EVENTS.

g. Review of unit operations to detect potential nuclear safety hazards.

h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant Manager or the Company Nuclear Review Board.

i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

RESPONSIBILITIES (Continued)

k. Review of every unplanned onsite release of radioactive material to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer and to the Company Nuclear Review Board.

l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL and RADWASTE TREATMENT SYSTEMS.

m. Review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last FRG meeting.

AUTHORITY

6.5.1.7 The Facility Review Group shall:

a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specifications 6.5.1.6a. through d. and m. above.

b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6a. through e. above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer and the Company Nuclear Review Board of ~~disagreement~~ between the FRG and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1 above.

RECORDS

6.5.1.8 The Facility Review Group shall maintain written minutes of each FRG meeting that, at a minimum, document the results of all FRG activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer and the Chairman of the Company Nuclear Review Board.

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

FUNCTION (Continued)

e. instrumentation and control

f. radiological safety

g. mechanical and electrical engineering

h. quality assurance practices

COMPOSITION

6.5.2.2 The ~~Executive Vice President~~ Senior Corporate Nuclear Officer 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,~~ Senior Corporate Nuclear Officer considering the alternatives to educational requirements of ANSI/ANS-3.1-1987, Sections 4.1.1 and 4.1.2.

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 or his designated alternate and at least a majority of CNRB members including alternates. No more than a minority of the quorom shall have line responsibility for operation of the unit.

AUDITS (Continued)

d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months.

e. Any other area of unit operation considered appropriate by the CNRB or the ~~Executive Vice President~~ Senior Corporate Nuclear Officer.

f. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.

g. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.

h. The radiological environmental monitoring program and the results thereof at least once per 12 months.

i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

j. The PROCESS CONTROL PROGRAM and implementing procedures for dewatering of radioactive bead resin at least once per 24 months.

AUTHORITY

6.5.2.9 The CNRB shall report to and advise the ~~Executive Vice President~~ Senior Corporate Nuclear Officer 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~~ Senior Corporate Nuclear Officer within 14 days following each meeting.

b. Reports of reviews encompassed by Specification 6.5.2.7 above shall be prepared, approved, and forwarded to the ~~Executive Vice President~~ Senior Corporate Nuclear Officer 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~~ Senior Corporate Nuclear Officer 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 EVENTS 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 this review shall be submitted to the CNRB, and the Senior ~~Vice President - Nuclear~~. Corporate Nuclear Officer

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~~ Corporate Nuclear Officer 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.

c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the Senior ~~Vice President - Nuclear~~ Corporate Nuclear Officer within 14 days ~~of the violation~~.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG 0737.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

Changes to the Topical Quality Assurance Report are governed by 10 CFR 50.54(a)(3). Changes to the Topical Quality Assurance Report description that reduce commitments previously accepted by the NRC require NRC approval prior to implementation. FPL will continue to inform the NRC of organizational changes affecting St. Lucie Plant.

Therefore, the proposed changes do not involve any reduction in a margin of safety.

Based on the above, we have determined that the amendment request does not (1) involve a significant increase in the probability or 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.

ATTACHMENT 3

Safety Analysis

INTRODUCTION:

The proposed amendments revise Section 6.0, Administrative Controls, of the St. Lucie Units 1 and 2 Technical Specifications to add general organizational titles and correct a typographical error.

DISCUSSION:

References to the "Senior Vice President-Nuclear" or "Executive Vice President" are changed to "Senior Corporate Nuclear Officer" to minimize the need for future changes to the Technical Specifications as a result of organizational or title changes. The title "Senior Corporate Nuclear Officer" will be assigned to a particular officer of FPL and this assignment will be clearly indicated in the FPL Topical Quality Assurance Report (FPLTQAR 1-76A). This topical report contains the description of the FPL Quality Assurance Program relative to its nuclear power plants.

Section 1.0 of FPLTQAR 1-76A discusses FPL's organizational structure. Section 1.2.1, Nuclear Division, provides a detailed discussion of the organizational structure and positional responsibilities for the control of, and responsibility for, nuclear power plant design, preoperational and start-up testing, operation, maintenance, refueling, and modification of the plants in accordance with written and approved procedures. It is in this section that FPL proposes to define its Senior Corporate Nuclear Officer.

Organizational relationships and responsibilities will continue to be described in detail in the FPL Topical Quality Assurance Report. Appendix B to 10 CFR 50 and 10 CFR 50.54(a)(3) govern changes to the organizations described in the Topical Quality Assurance Report. Changes to this program description which reduce commitments previously accepted by the NRC will require NRC approval prior to implementation.

Revisions and changes to FPLTQAR 1-76A are made in accordance with a Quality Procedure as outlined in Section 2.0 of the topical. A change to the FPL Nuclear Division officer title designated as the Senior Corporate Nuclear Officer would need to be accomplished in accordance with a Quality Procedure and the proposed change would be evaluated against the requirements of 10 CFR 50.54(a)(3). A change to the officer title designated as the Senior Corporate Nuclear Officer that is evaluated as reducing commitments made to the NRC would, necessarily, be submitted to the NRC for prior review and approval. A change to the officer title designated as the Senior Corporate Nuclear Officer that does not reduce a commitment to the NRC would be submitted to the NRC at least annually.

An additional change to the St. Lucie Unit 1 Technical Specifications is also proposed to correct a typographical error. The word "specified" is misspelled in Specification 6.5.2.9, Authority. FPL proposes to also make this administrative correction at this time.

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

(2) Operation of the facility in accordance with the proposed amendment 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 procedure changes or to physical modifications. 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, and maintained by, the Technical Specifications. The NRC will continue to be informed of organizational changes through controlled mechanisms. The Topical Quality Assurance Report provides a detailed description of organization and responsibilities as well as detailed organizational charts.