St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Organizational Titles and
Facility Review Group Composition

ATTACHMENT 1

ST. LUCIE UNIT 1 MARKED-UP TECHNICAL SPECIFICATION PAGES

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

General

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 President - Nuclear Division, 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 President - Nuclear Division 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.

General

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.

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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.

Supervisor

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.

2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

General

General

g. The Operations Supervisor shall hold a Senior Reactor Operator license.

SHIFT TECHNICAL ADVISOR

6.2.3 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 (1) the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8., September 1975, and (2) the Shift Technical Advisor who shall have a bachelor degree or equivalent in a scientific or engineering discipline with specific training in plant design and plant operating characteristics, including transients and accidents.

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6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS-3.1-1978 and ~~Appendix "A" of~~ 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

insert Manager

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6.5 REVIEW AND AUDIT

6.5.1 FACILITY REVIEW GROUP (FRG)

FUNCTION

6.5.1.1 The Facility Review Group shall function to advise the Plant Manager on all matters related to nuclear safety.

insert General

COMPOSITION

6.5.1.2 ~~The Facility Review Group shall be composed of the:~~

~~Member: Plant Manager~~
~~Member: Operations Superintendent~~
~~Member: Operations Supervisor~~
~~Member: Maintenance Superintendent~~
~~Member: Instrument & Control Supervisor~~
~~Member: Reactor Supervisor~~
~~Member: Health Physics Supervisor~~
~~Member: Technical Supervisor~~
~~Member: Chemistry Supervisor~~
~~Member: Quality Control Supervisor~~
~~Member: Assistant Plant Supt. Mechanical~~
~~Member: Assistant Plant Supt. Electrical~~

REPLACE WITH INSERT-A SHOWN ON NEXT PAGE

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

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INSERT - A to L-93-110, Attachment 1

INSERT FOR TS 6.5.1.2

The FRG shall have voting members composed of individuals from each of the following disciplines:

- Operations
- Reactor Engineering
- Health Physics
- Chemistry
- Licensing
- Instrument and Control
- Electrical Maintenance
- Mechanical Maintenance
- Technical Support
- Quality Assurance/Control
- Services

The Plant General Manager shall appoint the FRG members, in writing, and from this membership shall designate, in writing, a FRG Chairman.

Members shall meet or exceed the qualifications required for Managers, Supervisors, or Professional-Technical, as appropriate, pursuant to Specification 6.3.1.

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. General

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 President - Nuclear Division and to the Chairman of the Company Nuclear Review Board.

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. General

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 President - Nuclear Division 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.

n. Review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

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. General

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

c. Provide written notification within 24 hours to the President-Nuclear Division 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. General General

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 President-Nuclear Division and the Chairman of the Company Nuclear Review Board.

c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the President - Nuclear Division 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 General 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.

General

c. The change is documented, reviewed by the FRG and approved by the Plant Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the CNRB at least once per 24 months:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Shutdown Cooling System, High Pressure Safety Injection System, Containment Spray System, and RCS Sampling. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radioiodine Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points for these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,

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ATTACHMENT 2

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6.1 RESPONSIBILITY

General

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 President - Nuclear Division, 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 President - Nuclear Division 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.

General

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~~ Supervisor cap. (H) (P) cap. 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.

UNIT STAFF (Continued)

a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.

b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

c. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

General

General

g. The Operations Supervisor shall hold a Senior Reactor Operator License.

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. 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 Chairman, Company Nuclear Review Board (CNRB) 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 Chairman, CNRB.

AUTHORITY

6.2.3.4 The ISEG is an onsite independent technical review group that reports offsite to the Chairman, CNRB. 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 Chairman, CNRB.

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 or issued May 1977~~, except for the (1) Health Physics Supervisor who shall meet

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*Not responsible for sign-off function.

6.3 UNIT STAFF QUALIFICATIONS (Continued)

or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and plant operating characteristics, including transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training ~~Supervisor~~ Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS 3.1-1978 and ~~Appendix "A" of~~ 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 FACILITY REVIEW GROUP (FRG)

FUNCTION

6.5.1.1 The Facility Review Group shall function to advise the Plant ~~Manager~~ General on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 ~~The Facility Review Group shall be composed of the:~~

~~Member: Plant Manager~~
~~Member: Operations Superintendent~~
~~Member: Operations Supervisor~~
~~Member: Maintenance Superintendent~~
~~Member: Instrument & Control Supervisor~~
~~Member: Reactor Supervisor~~
~~Member: Health Physics Supervisor~~
~~Member: Technical Supervisor~~
~~Member: Chemistry Supervisor~~
~~Member: Quality Control Supervisor~~
~~Member: Assistant Plant Supt. Electrical~~
~~Member: Assistant Plant Supt. Mechanical~~

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

REPLACE WITH INSERT-A SHOWN ON NEXT PAGE

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.

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INSERT - A to L-93-110, Attachment 2

INSERT FOR TS 6.5.1.2

The FRG shall have voting members composed of individuals from each of the following disciplines:

- Operations
- Reactor Engineering
- Health Physics
- Chemistry
- Licensing
- Instrument and Control
- Electrical Maintenance
- Mechanical Maintenance
- Technical Support
- Quality Assurance/Control Services

The Plant General Manager shall appoint the FRG members, in writing, and from this membership shall designate, in writing, a FRG Chairman.

Members shall meet or exceed the qualifications required for Managers, Supervisors, or Professional-Technical, as appropriate, pursuant to Specification 6.3.1.

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.

General

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 President - Nuclear Division and to the Chairman of the Company Nuclear Review Board.

f. Review of all REPORTABLE EVENTS.

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

General

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 President - Nuclear Division 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.

n. Review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board.

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, b, d and e above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the President-Nuclear Division 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 President - Nuclear Division 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

PROCEDURES AND PROGRAMS (Continued)

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. General

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.

c. The change is documented, reviewed by the FRG and approved by the Plant Manager within 14 days of implementation. General

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the CNRB at least once per 24 months:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Shutdown Cooling System, High Pressure Safety Injection System, Containment Spray System, and RCS Sampling. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radioiodine Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

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ATTACHMENT 3

EVALUATION OF PROPOSED TS CHANGES

EVALUATION OF PROPOSED TS CHANGES

Introduction

Florida Power and Light Company (FPL) proposes to modify St. Lucie Unit 1 and St. Lucie Unit 2 Technical Specifications (TS) Section 6.0, "Administrative Controls". The proposed changes will (a) reflect the current FPL organizational titles throughout Section 6.0, (b) modify the Facility Review Group (FRG) composition to specify members according to discipline rather than by individual title designation, and (c) make editorial corrections.

Description of Changes

1. Where the titles of Plant Manager, Health Physics Manager, and Training Supervisor appear in TS Section 6.0, the following revisions are made:

   "Plant Manager" is changed to "Plant General Manager"
   "Health Physics Manager" is changed to "Health Physics Supervisor"
   "Training Supervisor" is changed to "Training Manager"

2. TS 6.3.1 is changed by deleting the improper phrase, "as endorsed by Regulatory Guide 1.8, September 1975 (reissued May 1977)"

3. TS 6.4.1 is changed by deleting the reference to "Appendix A" of 10 CFR Part 55.

4. TS 6.5.1.2 is modified to specify the Facility Review Group (FRG) composition in terms of the following plant disciplines rather than by designating members individually by job titles:

   Operations
   Reactor Engineering
   Health Physics
   Chemistry
   Licensing
   Instrument and Control
   Electrical Maintenance
   Mechanical Maintenance
   Technical Support
   Quality Assurance/Control
   Services

   Controls are added to ensure that an acceptable level of personnel qualifications and experience is maintained in the FRG.

Justification for TS Changes

The proposed changes to organizational titles resulted from a reorganization of the FPL Nuclear Division. FPL's Topical Quality Assurance Report (TQAR) was revised to reflect these changes in accordance with the requirements of Appendix B of 10 CFR 50 and 10 CFR 50.54(a)(3). Changes which would reduce commitments previously accepted by the NRC or which would alter the responsibilities for nuclear safety that are associated with the individual positions identified in this submittal were not made. Therefore, FPL considers these organizational changes to be acceptable.

TS 6.3.1 implies that ANSI/ANS 3.1-1978 is endorsed by Regulatory Guide 1.8, September 1975 (reissued May 1977). However, this regulatory guide endorses ANSI N18.1-1971 except for the position of Supervisor-Radiation Protection, and does not endorse the 1978 standard. Deleting this reference does not reduce or otherwise change existing FPL commitments for each member of the unit staff to meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978.

TS 6.4.1 requires, in part, a retraining and replacement training program for the unit staff to meet or exceed the requirements and recommendations of "Appendix A" of 10 CFR Part 55. The contents of Appendix A have been incorporated into the body of 10 CFR 55, specifically 10 CFR 55.59(c), and the appendix no longer exists. This change, therefore, does not represent a change in prior FPL commitments.

TS 6.5.1.2 currently limits the FRG composition and designates FRG members by specific organizational position titles. The proposed TS will delete these position titles and replace them with the disciplines to be represented in the FRG. The Licensing and Services disciplines will be added to those currently represented in the FRG and thereby broaden the scope of expertise available to perform FRG functions. Only the minimum number of FRG members will be specified in TS 6.5.1.2. This proposed method of designating the FRG composition will provide the Plant General Manager the flexibility to appoint additional qualified personnel from specialties within a given discipline, as necessary, to enhance the accomplishment of FRG multi-disciplinary review, audit, and advisory tasks. Quorum requirements remain unchanged. Moreover, eliminating specific position titles will obviate the need for a revision to this TS each time an FPL organizational change or title change occurs.

The changes proposed to TS 6.5.1.2 establish that the Plant General Manager will appoint, in writing, the FRG Chairman and individual members from each of the designated disciplines. The changes further establish that each FRG member will meet or exceed the qualification requirements identified by the standards specified in TS 6.3.1, as appropriate for Managers, Supervisors, or Professional-Technical. Thus, the required personnel qualifications and experience in the FRG will continue to be preserved.

The proposed changes are consistent with guidelines for acceptable methods to conduct independent reviews and audits described in NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants". In addition, changes to TS 6.5.1.2 similar to those proposed in this submittal were found acceptable by the NRC and approved in Amendments 153 and 148 to FPL Licenses DPR-31 and DPR-41, respectively, for Turkey Point Units 3 and 4, issued January 8, 1993.

The proposed changes will not alter the functions, responsibilities, or authority of the FRG or the Plant General Manager. Based on the considerations discussed above, FPL considers the proposed changes to be acceptable.

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Organizational Titles and
Facility Review Group Composition

ATTACHMENT 4

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Pursuant to 10CFR50.92, a determination may be made that a proposed license amendment involves no significant hazards consideration if 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 amendment revises certain administrative controls and does not alter any parameter or equipment reliability assumptions that are contained in the plant safety analyses to evaluate the consequences of an accident. Technical Specifications that are in place to preserve safety analysis assumptions or that provide assurance that the unit operating staff qualifications are acceptable have not been changed. Therefore, operation of the facility in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

(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 proposed amendment will not change the physical plant or the modes of plant operation defined in the Facility License. Therefore, 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.

(3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Changes proposed for the composition of the Facility Review Group will expand the scope of available expertise represented in that group and preserve its currently established qualifications, safety-related functions, responsibilities, and authority. The proposed amendment will not change the basis for any Technical Specification that is related to the establishment of or maintenance of nuclear safety margins. Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the discussion presented above and on the supporting Evaluation of Proposed TS Changes, FPL has concluded that this proposed license amendment involves no significant hazards consideration.