

St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment
Technical Review Responsibilities

ATTACHMENT 1

ST. LUCIE UNIT 2 MARKED-UP TECHNICAL SPECIFICATION PAGES

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~~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~~ ^{f(3) ← REPLACE} 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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ADMINISTRATIVE CONTROLS

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 President - Nuclear Division.
- 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.

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AUTHORITY

6.5.2.9 (10) ← REPLACE The CNRB shall report to and advise the President - Nuclear Division on those areas of responsibility specified in Specifications 6.5.2.7, and 6.5.2.8. and

RECORDS

6.5.2.10 (11) ← REPLACE Records of CNRB activities shall be prepared, approved, and distributed as indicated below:

6.5.2.9. ✓
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- a. Minutes of each CNRB meeting shall be prepared, approved, and forwarded to the President - Nuclear Division 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 President - Nuclear Division within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above shall be forwarded to the President - Nuclear Division and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.
- d. Technical reviews encompassed by Specification 6.5.2.9 above shall be prepared, maintained and a report of the activities forwarded each calendar month to the Chairman, CNRB.

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TECHNICAL REVIEW RESPONSIBILITIES

6.5.2.9 The technical review responsibilities under the cognizance of the CNRB shall encompass:

- a. Plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources that may indicate areas for improving plant safety:
- b. Plant operations, modifications, maintenance, and surveillance to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical;
- c. Internal and external operational experience information that may indicate areas for improving plant safety; and
- d. Making detailed recommendations through the Chairman - CNRB for revising procedures, equipment modifications or other means of improving nuclear safety and plant reliability.

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ATTACHMENT 2

EVALUATION OF PROPOSED TS CHANGES

Introduction

Florida Power and Light Company (FPL) proposes to change the St. Lucie Unit 2 Technical Specifications (TS) for the Independent Safety Engineering Group (ISEG). The proposed change maintains the requirement to perform technical reviews independent of the plant management chain. FPL believes this PLA to be consistent with the NRC guidance for line-item improvements to the existing facility TS.

Description of Change

The proposed Technical Specification changes are:

- * delete TS 6.2.3 "Independent Safety Engineering Group"
- * add TS 6.5.2.9 "Technical Review Responsibilities"

Justification for TS Change

The existing TS 6.2.3 requires that a five person organization, known as ISEG, be dedicated full-time to conduct independent technical reviews. FPL has recognized over the years that the specification in its current form provides very little flexibility for the performance of the required reviews. The requirement to have a full-time dedicated staff places constraints on the existing FPL organization. The ISEG composition requirement is burdensome to a utility as it restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public. The proposed change would maintain the requirement to perform independent technical reviews while providing increased flexibility to accomplish this function.

The proposed amendment will add TS 6.5.2.9 "Technical Review Responsibilities" under the responsibilities of TS 6.5.2 "Company Nuclear Review Board." This will maintain the requirement to conduct independent technical reviews and will give FPL the flexibility to better integrate programs such as the Human Performance Enhancement System, Operating Experience Feedback Program as well as the Nuclear Assurance Audit program to perform the required independent technical reviews. This flexibility will increase the effectiveness of the overall organization.

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The proposed amendment is consistent with the recommendations contained in the NRC's Regulatory Review Group Report draft, "Assessment of the Seabrook Operating License" dated February, 1993. This report found the current TS concerning the ISEG inflexible and provided the Revised Standard Technical Specifications as a solution. Specifically the report states, "... the composition of ISEG provides little flexibility. However, a Technical Specification change can be submitted adopting the Improved Standard Technical Specification approach; that would provide considerable flexibility in the implementation of this requirement."

The proposed change to the St. Lucie Unit 2 license is consistent with the guidance of NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants." FPL believes this PLA meets the NRC guidance for generic line-item improvements to the existing facility TS.

Based on the considerations discussed above, FPL considers the proposed change to the St. Lucie Unit 2 TS to be acceptable.

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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 maintains the requirement to perform independent technical reviews. The proposal does not change the plant design, limiting conditions for operation or related plant operating procedures. 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 does not change the physical plant or the modes of plant operation defined in the Facility License. The change does not impact the operation, reliability or repair of existing equipment and cannot introduce any new failure mechanism to existing systems. 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.

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

The proposed amendment does not change the physical plant, the procedures for operation or the maintenance of plant components. The change maintains the requirement to perform independent technical reviews. Assumptions, plant conditions, and analyses used to define or otherwise establish margins of safety for the operation of St. Lucie Unit 2 are not altered. 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.

