

St. Lucie Unit 1 and Unit 2  
Docket Nos. 50-335 and 50-389  
Proposed License Amendments  
Relocation of Audit Minimum  
Frequency Criteria to EPLTOAR

ATTACHMENT 1

ST. LUCIE UNIT 1 MARKED-UP TECHNICAL SPECIFICATION PAGES

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## ADMINISTRATIVE CONTROLS

- 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.~~ delete
- b. The performance, training and qualifications of the entire unit staff ~~at least once per 12 months.~~ delete
- 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.~~ delete
- 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.~~ delete
- e. Any other area of unit operation considered appropriate by the CNRB or the President - Nuclear Division.
- f. <sup>insert</sup> ~~The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.~~ delete
- g. <sup>replace</sup> ~~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.~~ delete
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures ~~at least once per 24 months.~~ delete
- j. The PROCESS CONTROL PROGRAM and implementing procedures for dewatering of radioactive bead resin ~~at least once per 24 months.~~ delete

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The fire protection equipment, programmatic controls including the implementing procedures, and program implementation utilizing an outside independent fire protection consultant.



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## ADMINISTRATIVE CONTROLS

- 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:~~ ~~delete~~

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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## ADMINISTRATIVE CONTROLS

### REVIEW

6.5.2.7 The CNRB shall review:

- a. The safety evaluations for (1) changes to procedures, equipment, or systems and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications or this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
- 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 meetings 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.~~ delete
- b. The performance, training and qualifications of the entire unit staff ~~at least once per 12 months.~~ delete
- 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.~~ delete

## 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.~~ delete
- 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.~~ delete
- (deleted) insert
- 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.~~ replace
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- at
- j. The PROCESS CONTROL PROGRAM and implementing procedures for dewatering of radioactive bead resin ~~at least once per 24 months.~~ delete

### AUTHORITY

6.5.2.9 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.

### 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 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.





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## ADMINISTRATIVE CONTROLS

### 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.

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.

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:~~ delete

delete

- a. Primary Coolant Sources Outside Containment

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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 change St. Lucie Unit 1 and Unit 2 Technical Specifications (TS) Section 6.0, "Administrative Controls," by deleting the frequencies specified for audits performed under the cognizance of the Company Nuclear Review Board (CNRB). The frequency of audits of these activities will be controlled as described in the FPL Topical Quality Assurance Report (FPLTQAR), wherein the minimum audit frequency for any activity is established as biennial unless the audit is otherwise required to be performed more frequently by the TS, Code of Federal Regulations, or other licensing commitments.

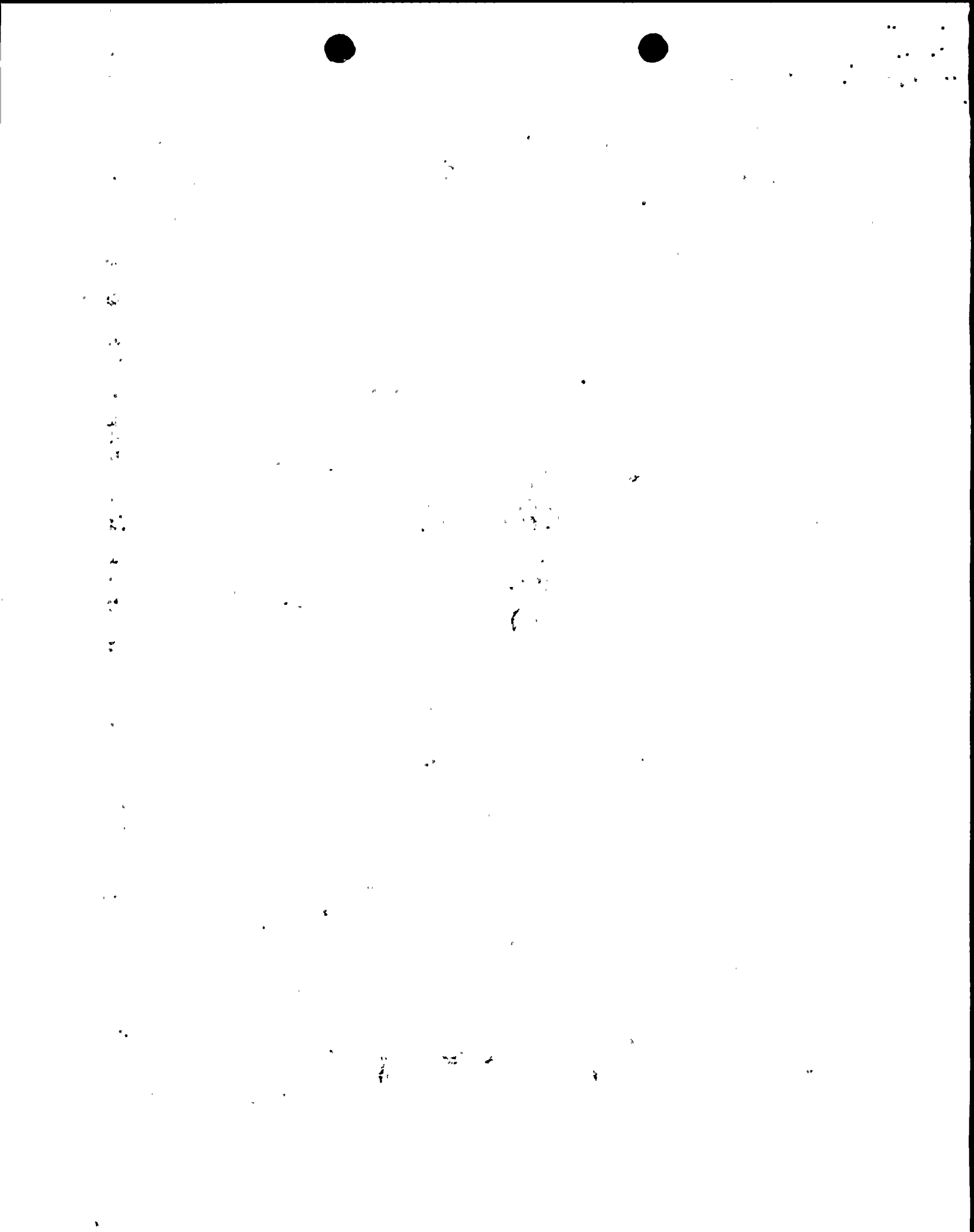
The proposed amendment will improve management flexibility for directing Quality Assurance (QA) resources, as appropriate, from activities that would merit a longer audit interval (and for which the existing TS prevents adjustment) to those that indicate a need for increased attention. In addition, the amendment will enhance FPL's ability to schedule certain audits more effectively based upon actual performance of plant activities that are compatible with St. Lucie Plant fuel cycles. FPL considers this proposal to be a line-item improvement to the existing facility TS.

### Description of Changes

TS 6.5.2.8.a, b, c, d, h, i, j, and TS 6.8.4 are revised by deleting the specified audit intervals.

TS 6.5.2.8.f is deleted. The existing audit activity for this specification is relocated to TS 6.5.2.8.g.

TS 6.5.2.8.g is revised by incorporating the fire protection "programmatic controls, including the implementing procedures" from existing TS 6.5.2.8.f. The option for utilizing a "licensee" fire protection engineer and the specified audit intervals are deleted.

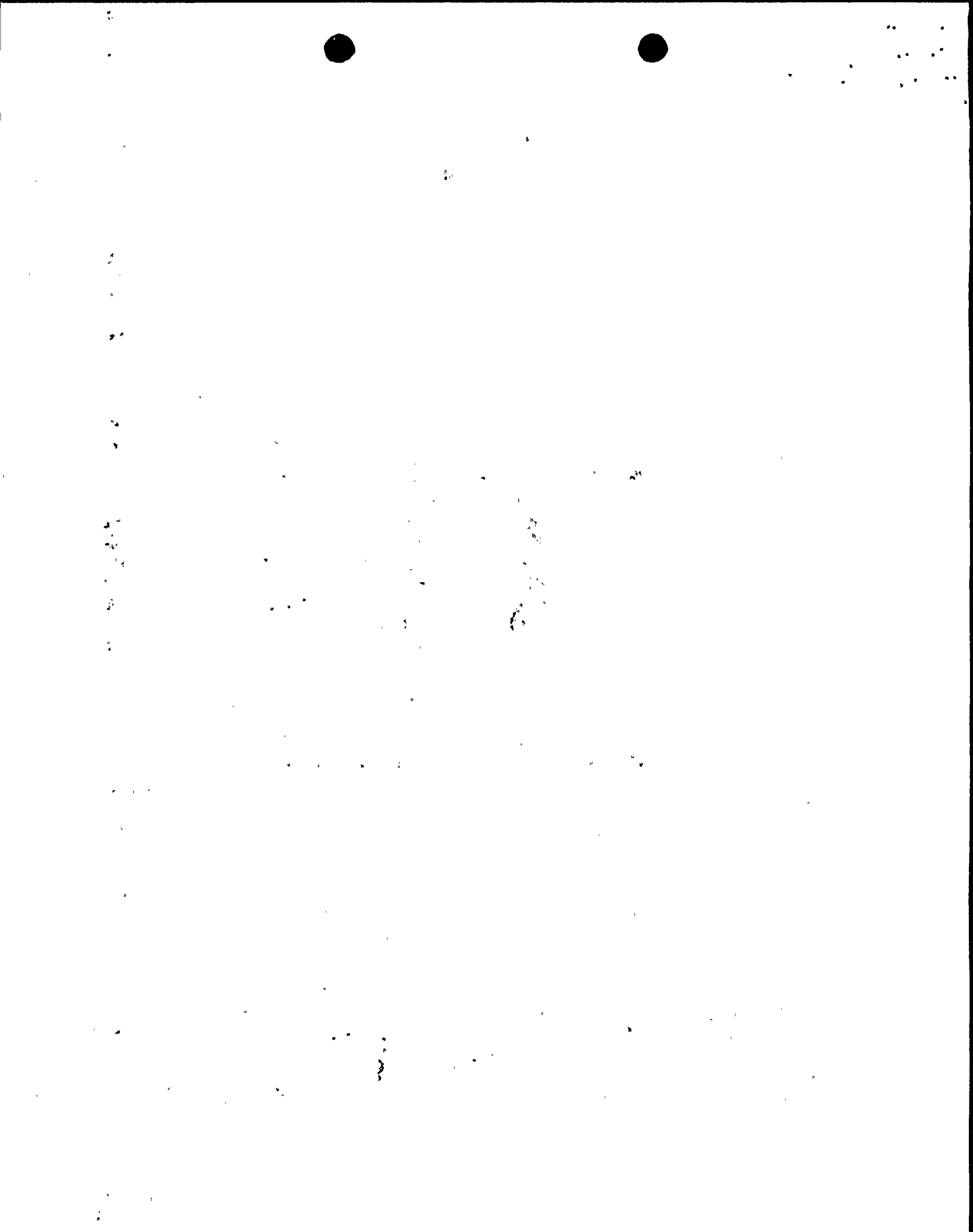


Bases for the Proposed Changes

The system of audits devised to verify compliance with safety and quality related requirements at the St. Lucie plant is described in the Administrative Controls sections 6.5.2.8 and 6.8.4 of each unit's TS. These audits are performed under the cognizance of the CNRB. Removing the minimum audit frequencies from the activities listed in the TS is tantamount to relocating the periodicity criteria to the administrative controls provided by the FPLTOAR. The proposed amendment will not reduce the scope, specific activities, quality, or level of management associated with such audits nor change the bases for assurance that safety-related activities have been performed correctly. Only the minimum frequency for those audits that are presently specified to be more frequent than biennial (2-years) will change.

Program requirements and the bases for FPL's Quality Assurance Program are contained in the FPLTOAR. The basis for planning and scheduling quality assurance audits includes FPL's commitment to perform audits of selected aspects of operational phase activities at a frequency commensurate with their safety significance and, unless otherwise mandated, in such a manner as to assure that an audit of safety related functions is completed within a period of two years. This basis is consistent with guidance provided in ANSI N18.7-1976/ANS-3.2, paragraph 4.5.

FPL considers that performing audits more frequently than biennially in areas that do not exhibit problems, in areas which have marginal or no safety significance, or of plant functions that have not had activity since the applicable previous audit, to be a burden that does not provide any benefit toward the maintenance or improvement of plant safety. The FPLTOAR does require that follow-up action, including re-audit of deficient areas, be taken where necessary, and also that the audit system be periodically reviewed and revised as necessary to assure coverage commensurate with current and planned activities. Rigid schedules of less than biennial periodicity do not allow management the flexibility to adjust audits of an activity that has a record of exceptional performance so that dilution of resources which are devoted to areas of perceived weaknesses can be minimized and the benefits to safety can be maximized. Similarly, audit schedules cannot be adjusted to more effectively encompass plant activities that are performed at regular intervals which are longer than the specified audit intervals. The proposed minimum frequency will enhance audit compatibility with St.





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Lucie Plant fuel cycles, thereby improving the effectiveness of audits of plant activities that are performed only during refueling outages. For these reasons, FPL considers that a two year audit cycle during the operation phase of plant life allows more in-depth and meaningful audits in each regularly scheduled area and permits a broader scope of audits for ongoing activities than is practicable with the existing TS requirements.

The biennial audit of fire protection programmatic controls and implementing procedures required by TS 6.5.2.8.f will be incorporated into the audit scope of TS 6.5.2.8.g. Neither the frequency nor the scope of this activity will be changed by this proposal. The resultant comprehensive audit of fire protection equipment, programmatic controls including implementing procedures, and program implementation will be performed by a qualified audit team which will include at least a lead auditor from the FPL QA organization and an outside independent fire protection consultant (presently required only for a triennial audit). The minimum audit frequency will be biennial; however, more frequent audits may be conducted based on audit findings. The proposed amendment does not alter the technical or QA requirements which are required to be audited to verify compliance with the St. Lucie plant fire protection program. In fact, the effectiveness of the audit program will be enhanced by the increased utilization of outside expertise, and management flexibility for directing QA resources will be improved.

In addition to the required formal periodic audits, Nuclear Assurance Quality Instructions implement a supplemental monitoring program for activities important to plant safety. This program provides for continuing performance evaluations, identification of anomalous performance and precursors of potential problems, timely reporting to management having the authority to effect corrective action, and verification of satisfactory resolution of problems and/or deficiencies.

### Conclusion

The proposed amendment will not alter the specific activities which are required to be audited to verify compliance with the quality and safety related requirements of the St. Lucie plants. Management flexibility for directing resources to perform these audits will be improved and the burden of performing an audit for the sole purpose of satisfying an inflexible periodicity requirement will be reduced. The specified

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audits will continue to be performed under the cognizance of the CNRB and the bases for assurance that safety-related activities have been performed correctly will not be changed.

The FPLTOAR establishes a minimum biennial (2-year) frequency unless more frequent audits are otherwise mandated by regulatory requirements or license commitments. The administrative controls described in this topical report are consistent with regulatory guidance and industry standards for QA Programs and provide for scheduling quality assurance audits based on the safety significance and extent of plant activities. Follow-up action, including re-audit of deficient areas, where necessary, is also required. The FPLTOAR was found acceptable by the NRC staff for satisfying the Quality Assurance Criteria of 10 CFR 50, Appendix B, and changes to this document are controlled pursuant to 10 CFR 50.54(a).

Based on the considerations discussed above, FPL considers the proposed changes to the St. Lucie Unit 1 and Unit 2 TS to be acceptable. In addition, it is noted that the changes (absence of audit frequencies) are consistent with NUREG-1432, Standard Technical Specifications for Combustion Engineering Plants.



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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION



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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 relocates administrative control criteria for minimum audit frequencies from the facility Technical Specifications to the FPL Quality Assurance (QA) Program. The QA Program is described in the FPL Topical Quality Assurance Report pursuant to 10 CFR 50, Appendix B. The change does not alter the bases upon which assurance is provided that safety-related activities are performed correctly nor does it involve the conditions and assumptions utilized in the analyses of plant transients and accidents. 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. The change does not involve the addition or modification of equipment nor does it alter the design or operation of plant 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 alter the bases for assurance that safety-related activities are performed correctly or that compliance with the required Limiting Conditions for Operation will be achieved. The change does not alter the basis for any Technical Specification that is related to the establishment of or maintenance of a nuclear safety margin. 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.