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SUBJECT: Forwards revised evaluation of 930923 proposed license amend request to revise TS for Independent Safety Engineering Group re technical review responsibilities.

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July 25, 1994

L-94-178  
10 CFR 50.90

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

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

By letter L-93-235 (9/23/93), Florida Power & Light Company (FPL) requested to revise the St. Lucie Unit 2 Technical Specifications (TS) for the Independent Safety Engineering Group (ISEG). Attachment 2 is a revised evaluation of the proposed TS change which replaces the previous Attachment 2 in its entirety. The evaluation of no significant hazards consideration contained in L-93-235 is not affected by this supplement. The revised evaluation has been reviewed by the St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board.

In accordance with 10 CFR 50.91 (b)(1), a copy of the revised evaluation is being forwarded to the State Designee for the State of Florida.

Please contact us if there are any questions about this submittal.

Very truly yours,

*D. A. Sager*  
D. A. Sager  
Vice President  
St. Lucie Plant

DAS/JWH/kw

Attachment

DAS/PSL #1157-94

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC.  
Senior Resident Inspector, USNRC, St. Lucie Plant.  
Mr. W.A. Passetti, Florida Department of Health and  
Rehabilitative Services.

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

ATTACHMENT 2

EVALUATION OF PROPOSED TS CHANGES

Introduction

By letter L-93-235 (9/23/93), Florida Power and Light Company (FPL) proposed changes to the St. Lucie Unit 2 Technical Specifications (TS) for the Independent Safety Engineering Group (ISEG). This proposal maintains the requirement to perform technical reviews independent of the plant management chain. This requirement is accomplished by maintaining the Function, Responsibilities, Authority and Records for Technical Reviews and deleting the composition section. FPL believes this Proposed License Amendment (PLA) to be consistent with the NRC guidance for line-item improvements to the existing facility TS. Clarifications are hereby provided to facilitate the review of the proposed change.

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"
- \* add TS 6.5.2.11.d "Technical Review Records"

Justification for TS Change

The existing TS 6.2.3 is divided into five sections. The five sections are: Function, Responsibilities, Authority, Records and Composition.

The Function as described in the current TS 6.2.3.1 is maintained in the proposed TS 6.5.2.9.a. The Quality Assurance Department (QA) will be responsible for the Technical Review function and will provide plant and senior management, through the Company Nuclear Review Board (CNRB), with recommendations regarding improvements in nuclear safety. Plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources that may indicate areas for improving plant safety will be reviewed by QA. Appropriate controls, such as organizational reporting and implementing procedures, are in place to ensure the independence of this function and to ensure recommendations regarding nuclear safety improvements are properly dispositioned.

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Revised Proposed License Amendment  
Technical Review Responsibilities - Revised

The Responsibilities as described in the current TS 6.2.3.3 are maintained in the proposed TS 6.5.2.9.b and c. These responsibilities contain the same essential elements necessary to accomplish the ISEG function as are contained in the current specification. FPL plans to continue these types of reviews under the proposed amendment utilizing the QA staff. The responsibility to the CNRB Chairman concerning Technical Reviews remains unchanged.

The Authority as described in the current TS 6.2.3.4 is maintained in the proposed TS 6.5.2.9.d. Technical Reviews will be conducted by QA in the same manner as current QA activities. A Site Quality Manual Procedure approved by the Site Vice President and Site Quality Manager will provide the authority for the conduct of independent Technical Reviews including the requirement for response to recommendations resulting from these reviews. The results of all Technical Review activities will be reported to the Chairman, CNRB. Independence is preserved through the off-site reporting relationship of the Site Quality Manager to the Vice President, Nuclear Assurance. The CNRB Chairman also reports to the Vice President, Nuclear Assurance. There is no reduction in the level of authority pertaining to Technical Reviews.

The Records as described in the current TS 6.2.3.5 are maintained in the proposed TS 6.5.2.11.d. Records of Technical Review activities will be maintained by QA and a copy forwarded to the CNRB Chairman. The CNRB has the responsibility to report and advise the President - Nuclear Division concerning the area of Technical Reviews.

The Composition as described in the current TS 6.2.3.2 requires that a five person organization, known as ISEG, be dedicated full-time to conduct independent technical reviews. FPL proposes to delete the Composition section. The ISEG Composition section 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. FPL has recognized over the years that this section of the specification provides very little flexibility for the performance of the required reviews. The proposed change would provide the necessary increased flexibility to accomplish this function. An analysis of the Technical Reviews performed by the current ISEG group and QA shows an overlap in the reviews conducted by these groups. FPL intends to integrate this function within the St. Lucie Plant QA organization.

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Technical Review Responsibilities

Guidelines for the conduct of Technical Reviews will be provided in Quality Instructions and assignments for the reviews will be based on both technical and audit expertise within the QA staff. Personnel assigned Technical Review responsibilities will meet the qualifications of ANSI/ANS 3.1 - 1978 as stated in TS 6.3.1. In addition, the St. Lucie Plant QA organization contains several individuals with previous ISEG experience.

In summary, the proposed amendment will delete TS 6.2.3 "Independent Safety Engineering Group," add TS 6.5.2.9 "Technical Review Responsibilities" and add TS 6.5.2.11.d regarding Technical Review Records. This will maintain the requirement to conduct independent Technical Reviews and will give FPL the flexibility to integrate technical reviews into the Nuclear Assurance Audit program. This flexibility will increase the effectiveness of the overall organization and will not decrease the protection afforded to the health and safety of the public.

The proposed amendment is consistent with the recommendations contained in the NRC's Regulatory Review Group Report, Volume 3, Appendix A; dated August, 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 report concluded, "The Improved Standard Technical Specifications permit the ISEG function to be performed under the review and audit program. This permits more flexible methods of performing the ISEG function (ie., by a standing committee or by assigning qualified individuals capable of conducting these reviews and audits)."

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.