

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9611060187    DOC. DATE: 96/10/31    NOTARIZED: YES    DOCKET #  
FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.    05000335  
50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.    05000389  
AUTH. NAME    AUTHOR AFFILIATION  
STALL, J.A.    Florida Power & Light Co.  
RECIP. NAME    RECIPIENT AFFILIATION  
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-67 & NPF-16,  
requesting revisions to 6.5.1 re facility review group &  
6.8 re procedures & programs.

DISTRIBUTION CODE: A001D    COPIES RECEIVED: LTR 1 ENCL 1    SIZE: 14 + 11  
TITLE: OR Submittal: General Distribution

NOTES:

|           | RECIPIENT       |  | COPIES |      | RECIPIENT             |     | COPIES |  |
|-----------|-----------------|--|--------|------|-----------------------|-----|--------|--|
|           | ID CODE/NAME    |  | LTR    | ENCL | ID CODE/NAME          | LTR | ENCL   |  |
|           | PD2-3 LA        |  | 1      | 1    | PD2-3 PD              | 1   | 1      |  |
|           | WIENS, L.       |  | 1      | 1    |                       |     |        |  |
| INTERNAL: | ACRS            |  | 1      | 1    | <u>FILE CENTER 01</u> | 1   | 1      |  |
|           | NRR/DE/EMCB     |  | 1      | 1    | NRR/DRCH/HICB         | 1   | 1      |  |
|           | NRR/DSSA/SPLB   |  | 1      | 1    | NRR/DSSA/SRXB         | 1   | 1      |  |
|           | NUDOCS-ABSTRACT |  | 1      | 1    | OGC/HDS3              | 1   | 0      |  |
| EXTERNAL: | NOAC            |  | 1      | 1    | NRC PDR               | 1   | 1      |  |

C  
A  
T  
E  
G  
O  
R  
Y  
1  
D  
O  
C  
U  
M  
E  
N  
T

NOTE TO ALL "RIDS" RECIPIENTS:  
PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS  
OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL  
DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTR 13 ENCL 12



**FPL**

**OCT 3 1 1996**

L-96-256  
10 CFR 50.90

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

RE: St. Lucie Unit 1 and Unit 2  
Docket Nos. 50-335 and 50-389  
Proposed License Amendments  
Onsite Facility Review Group

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating License DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. Changes are proposed for TS 6.5.1, "Facility Review Group (FRG)," and for TS 6.8, "Procedures and Programs," that provide for more efficient use of on-site management personnel in the review and approval process for plant procedures. The revised administrative controls are consistent with industry standards which are part of FPL's approved Quality Assurance Program. In addition, a minor change is made to Unit 1 TS. 6.5.1.7 to properly identify the FRG as a review group.

It is requested that the proposed amendments, if approved, be issued to permit implementation within 60 days of issuance.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain copies of the affected technical specifications pages marked up to show the proposed changes.

The proposed amendments have been reviewed by the St. Lucie Facility Review Group and the FPL Company Nuclear Review Board. In accordance with 10 CFR 50.91 (b) (1), copies of the proposed amendments are 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,

J.A. Stall  
Vice President  
St. Lucie Plant

9611060187 961031  
PDR ADOCK 05000335  
P PDR

A0011/1

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

L-96-256  
Page 2

JAS/RLD

Attachments

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.

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

L-96-256  
Page 3

STATE OF FLORIDA            )  
  )  
COUNTY OF ST. LUCIE        )            ss.

J. A. Stall being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

  
\_\_\_\_\_  
J. A. Stall

STATE OF FLORIDA  
COUNTY OF ST. LUCIE

Sworn to and subscribed before me  
this 31 day of October, 1996  
by J. A. Stall, who is personally known to me.

  
\_\_\_\_\_  
Signature of Notary Public-State of Florida

 KAREN WEST  
MY COMMISSION # CC359926 EXPIRES  
April 18, 1998  
BONDED THRU TROY FAIR INSURANCE, INC.

\_\_\_\_\_  
Name of Notary Public (Print, Type, or Stamp)

1954  
MAY 12 1954  
U.S. DEPARTMENT OF AGRICULTURE  
WASHINGTON, D. C.

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

ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES

## EVALUATION OF PROPOSED TS CHANGES

### Introduction

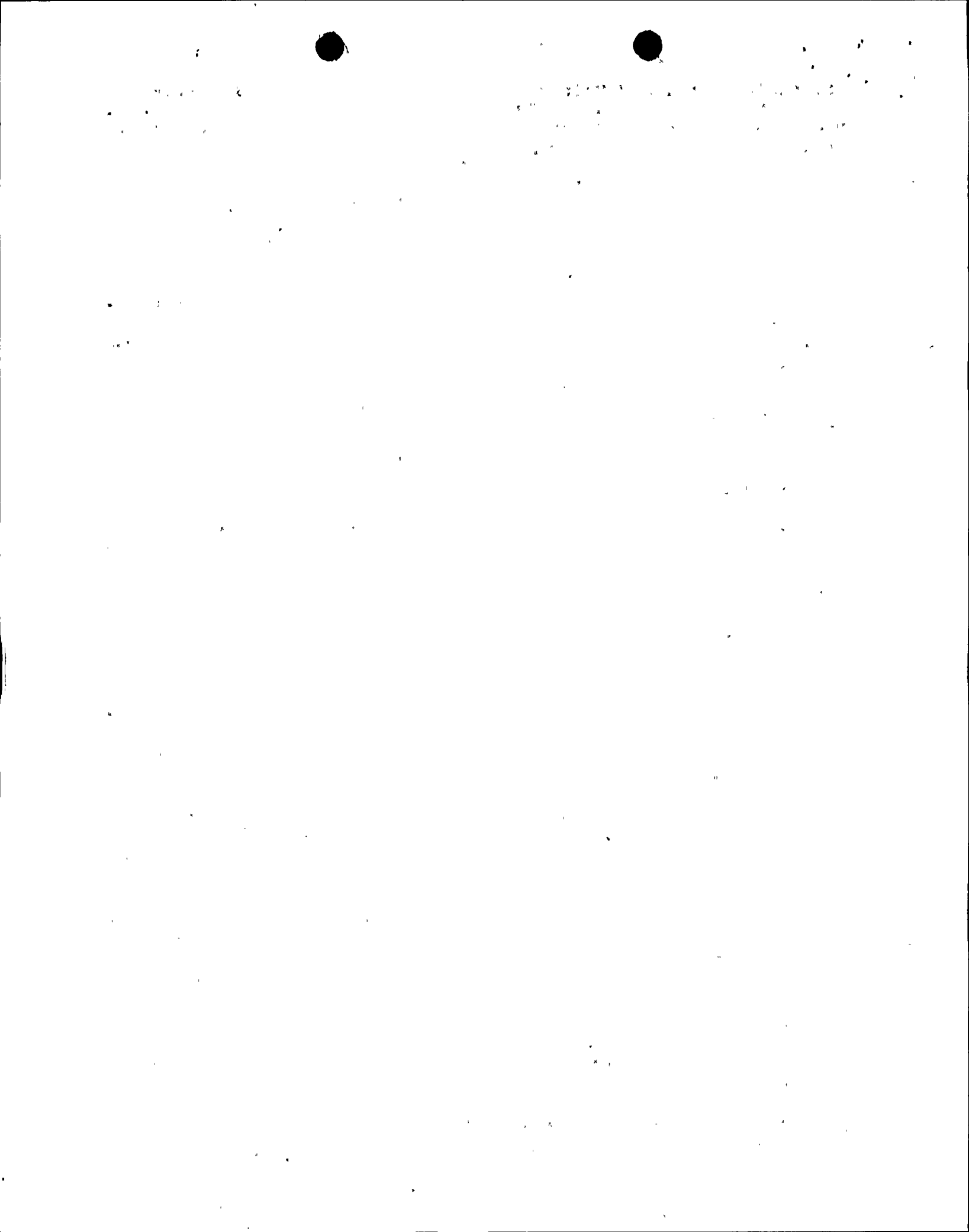
The proposed amendment to Facility Operating License DPR-67 for St. Lucie Unit 1 (PSL1) and NPF-16 for St. Lucie Unit 2 (PSL2) will revise Technical Specification (TS) 6.5.1, "Facility Review Group (FRG)," and TS 6.8, "Procedures and Programs." The revisions provide for more efficient use of on-site personnel possessing the requisite experience and qualifications in the review and approval process for plant procedures. Collectively, the proposed changes enhance effective and timely implementation of procedure control measures without diminishing their scope, provide management flexibility in the assignment of independent review and approval accountabilities, and significantly reduce the administrative burden presently carried by the FRG and the Plant General Manager. The proposed changes are consistent with applicable industry standards included as part of FPL's Quality Assurance program pursuant to 10 CFR Part 50, Appendix B.

### Background

The FRG is an on-site, multi-discipline, standing committee whose function is to advise the Plant General Manager (PGM) on all matters related to nuclear safety. FRG members must have qualifications that meet or exceed the qualifications for Managers, Supervisors, or Professional-Technical, as appropriate for their discipline, pursuant to TS 6.3.1. A quorum consisting of the Chairman or his designated alternate, and at least four other members is required for the FRG to perform the responsibility and authority provisions of Specification 6.5.1.

TS 6.5.1.6.a requires the FRG to review all procedures and programs, and changes thereto, required by Specification 6.8, which includes applicable procedures recommended in Appendix "A" of USNRC Regulatory Guide (RG) 1.33, Revision 2, February 1978. The required FRG review, and PGM approval of each procedure and changes thereto, must be completed prior to implementation pursuant to TS 6.8.2.

Revision 2 of RG 1.33 endorses industry standard ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants, Revision of N18.7-1972." FPL's commitment to this industry standard is documented in





the approved FPL Topical Quality Assurance Report (TQAR). The TQAR addresses the requirements of 10 CFR Part 50, Appendix B, and includes document control measures that are implemented by St. Lucie plant procedures.

In addition to the on-site FRG, an Independent Review Program is carried out by the FPL Company Nuclear Review Board (CNRB). This off-site, standing committee performs review and audit activities pursuant to TS 6.5.2.

Proposed Technical Specification Changes for PSL1 and PSL2

Copies of the affected TS pages, marked-up to show the changes, are contained in Attachments 3 and 4 to this submittal.

TS 6.5.1.6.a, RESPONSIBILITIES: Item (1) presently requires the FRG to review "all procedures required by Specification 6.8 and changes thereto." This statement is revised to read,

*(1) all new procedures required by Specification 6.8 and all procedure changes that require a written safety evaluation,*

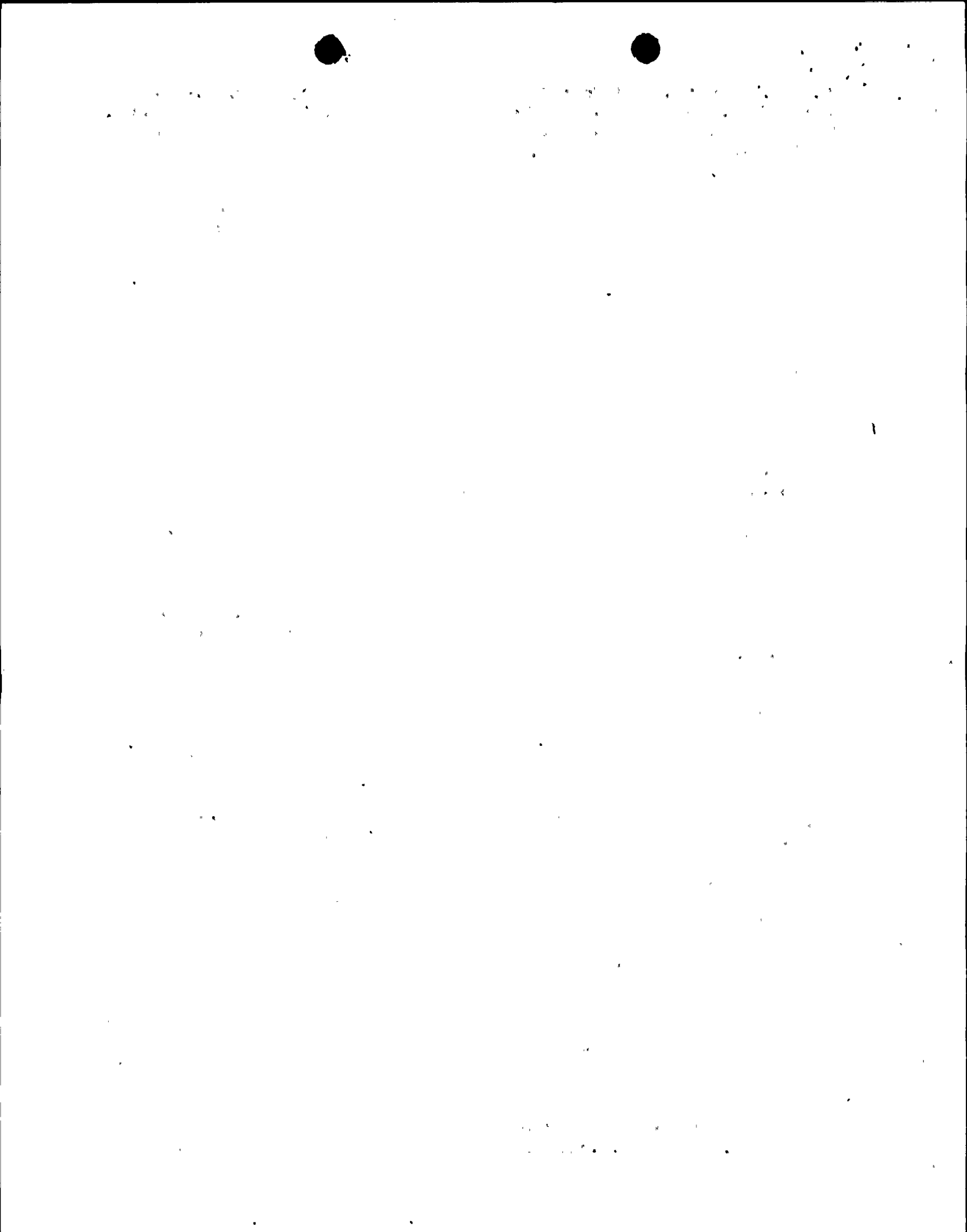
TS 6.5.1.7.a, AUTHORITY: This specification presently requires the FRG to "Recommend in writing to the Plant General Manager approval or disapproval of items considered under Specifications 6.5.1.6.a through d. [and m.] above" NOTE: Text in brackets for PSL2 only. This statement is revised to read,

*Provide approval or disapproval of items considered under Specifications 6.5.1.6.a through d. [and m.] above, as certified in writing by the FRG Chairman or his designated Alternate.*

TS 6.5.1.8, RECORDS: The "Plant General Manager," is added to the last sentence, which identifies recipients of the FRG minutes.

TS 6.8.2: This Specification presently states, "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." This statement is revised to read,

*Each new procedure of Specification 6.8.1.a through i. above, except 6.8.1.f, shall be reviewed and approved by*



*the FRG prior to implementation. Fire Protection Program implementation procedures and changes thereto shall be reviewed by the FRG and approved by the Plant General Manager. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.*

**TS 6.8.3:** This specification presently addresses temporary changes to procedures. The scope is expanded, and 6.8.3 is rewritten:

Changes to Procedures

a. Each revision to the procedures required by Specification 6.8.1.a through i. above shall be independently reviewed by an individual or group from the appropriate discipline(s), and except as required by Specifications 6.5.1.7 and 6.8.2, each revision shall be approved by the Plant General Manager or individual(s) designated in writing by the Plant General Manager prior to implementation. Personnel authorized to approve procedure changes pursuant to this Specification shall be at a management level appropriate for the activities affected by the procedure being revised.

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

(1) The intent of the original procedure is not altered.

(2) 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.

(3) The change is documented and, if appropriate, incorporated in the next revision of the affected procedure pursuant to 6.8.3.a.

Evaluation of Proposed Changes

The existing TS 6.5.1 and 6.8 require all revisions to the plant procedures identified in Specification 6.8 to be reviewed by the multi-discipline, on-site, Facility Review Group (FRG), and approved by the Plant General Manager (PGM) prior to implementation. In addition, temporary changes that have been previously 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 by the change) must also be reviewed by the FRG and approved by the PGM within 14 days of implementation. This management review and level of approval is required regardless of the safety significance of the change.

Plant operating experience has shown that a significant number of procedure revisions do not require multi-discipline reviews, and do not require written safety evaluations to determine/document whether safety questions are involved. Further, the requirement for FRG review and PGM approval of procedure changes that do not affect nuclear safety was identified in an independent quality assurance (QA) assessment of FRG efficiency as an item that should be considered for improvement. This assessment included bench marking St. Lucie FRG practices against similar groups at other nuclear utilities. Accordingly, the changes proposed for TS 6.5.1 and 6.8 allow for a more flexible review and approval process for procedure revisions and remains consistent with industry standards to which FPL is committed via the NRC approved Nuclear Quality Assurance Program pursuant to 10 CFR Part 50, Appendix B.

1. Proposed TS 6.5.1.6.a(1) requires the FRG to review all new procedures required by Specification 6.8, and only those procedure changes that require a written safety evaluation. This latter requirement will be compatible with existing document control measures established by St. Lucie Plant Quality Instructions and Administrative Procedures pursuant to the FPL Quality Assurance Program. These measures require each proposed change to plant procedures, including any temporary change, to be reviewed for technical accuracy by an individual other than the originator of the change, and to be further evaluated by an individual trained in the screening process that is used to determine if an activity requires a written safety evaluation pursuant to 10 CFR 50.59. If a safety evaluation is required, then further review by the FRG will be performed. If a safety evaluation is not required, then the revised procedure may be submitted for approval pursuant to Specification 6.8.3 (proposed). Completion of the required reviews, including the basis for the safety evaluation screening results, are documented on a formal procedure change request form which is retained as a QA record.

Existing items (2) and (3) of this Specification require the FRG to review all programs required by TS 6.8 and changes thereto, and any other proposed procedures and changes thereto as determined by the PGM to affect nuclear safety, and are not altered by the proposed revision. The proposed TS 6.5.1.6.a meets or exceeds the requirements of industry standard ANSI N18.7-1976/ANS-3.2 involving the review of changes to procedures, and will eliminate the



administrative burden of performing additional FRG reviews for those procedure changes that do not warrant FRG attention.

2. Existing TS 6.5.1.7.a only authorizes the FRG to recommend to the PGM approval or disapproval of items considered under Specifications 6.5.1.6.a through d. [and 6.5.1.6.m. for PSL2]. The proposed TS 6.5.1.7.a will authorize the FRG to provide approval or disapproval of such items, as certified in writing by the FRG Chairman or his designated Alternate. Providing the FRG with this approval authority will reduce the administrative burden presently carried by the PGM and enhance the timely disposition/processing of these items.

The FRG Chairman is designated by and serves at the pleasure of the PGM pursuant to TS 6.5.1.2. In addition, specification 6.5.1.7.c provides assurance that any disagreement between the PGM and FRG are resolved in a timely manner, and reiterates the responsibility and authority of the PGM pursuant to Specification 6.1.1. Consequently, FPL believes that the proposed change to TS 6.5.1.7.a will neither degrade the quality of judgement relative to the subject items to be approved/disapproved, nor diminish the responsibility, authority, or control over those items by the PGM.

3. The proposed revision to TS 6.5.1.8 adds the Plant General Manager to the list of those persons who are required to be provided copies of the FRG minutes. This change provides assurance that the PGM will be cognizant of FRG activities performed under the authority provisions of TS 6.5.1.7.

4. Proposed TS 6.8.2 is revised to authorize FRG approval of all new procedures required by the reference Specification, except Fire Protection Program implementing procedures. These latter procedures and changes thereto will continue to be reviewed by the FRG and approved by the PGM. The revision is consistent with the authority provisions proposed for Specification 6.5.1.7.a.

5. Existing TS 6.8.3 only addresses temporary changes to procedures. The proposed TS 6.8.3 is constructed to envelop all revisions to procedures of the reference Specification 6.8.1.a through i, including temporary changes.

(a) Proposed TS 6.8.3.a requires each procedure revision to be independently reviewed by an individual or group from the appropriate discipline. Revisions not otherwise addressed by (proposed) TS 6.5.1.7, and 6.8.2 will be approved by the PGM or individuals authorized by the PGM who are at a management level appropriate for the activities affected by the procedure being





revised. The proposed specification provides flexibility for the PGM, which can be used at his/her discretion, to include other qualified management personnel in the programmatic process for approving changes to plant procedures.

(b) Proposed TS 6.8.3.b provides for making temporary changes to procedures if: (1) the intent of the original procedure is not altered, (2) 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, and (3) the change is documented, and, if appropriate, incorporated in the next revision of the affected procedure pursuant to Specification 6.8.3.a (proposed). Conditions (1) and (2) are the same as required by the existing TS 6.8.3, and have not been altered. Condition (3) of the proposed Specification deletes the existing requirement for FRG review and PGM approval of each temporary change within 14 days of implementation. Rather, each temporary change, if appropriate, will be incorporated in the next revision of the affected procedure following final approval pursuant to TS 6.8.3.a (proposed) above.

The need for a temporary change (TC) is typically identified during performance of an on-shift activity in the field, and plant administrative procedures provide guidance for making a determination that the change does not alter the intent of the original procedure. In addition, the TC process requires an independent review for technical accuracy, a determination by a qualified reviewer that a written safety evaluation is not required, and the licensed Shift Supervisor to be one of the two members of the plant management staff approving the change prior to implementation. This latter requirement is reasonable since the Shift Supervisor has primary management authority and responsibility for overall direction of operations on his/her shift, and provides guidance, interpretation, and direction to operators regarding the application of procedures.

The post implementation review of temporary changes by the FRG and approval by the PGM within 14 days of implementation, as required by the existing TS 6.8.3, contributes to the administrative burden previously discussed. The proposed requirement to incorporate the temporary change, if appropriate, into the next revision of the affected procedure is consistent with industry standard ANSI N18.7-1976/ANS-3.2.

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

L-96-256  
Attachment 1  
Page 7 of 7

### Conclusion

The changes proposed for Specifications 6.5.1 and 6.8 meet or exceed the requirements of industry standard ANSI N18.7-1976/ANS-3.2 involving the review and approval of changes to procedures, including temporary changes, and will eliminate the administrative burden of performing additional FRG reviews for those procedure changes that do not warrant FRG attention. The proposed changes to the administrative controls provide assurance that the quality of judgement relative to the subject items to be approved/disapproved is made at the appropriate level, and do not diminish the responsibility, authority, or control over those items by the PGM.



THE UNIVERSITY OF CHICAGO  
LIBRARY

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

ATTACHMENT 2

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION**

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION**

*Description of amendment request:* The proposed amendment to Facility Operating License DPR-67 for St. Lucie Unit 1 (PSL1) and NPF-16 for St. Lucie Unit 2 (PSL2) will revise administrative controls Technical Specification (TS) 6.5.1, "Facility Review Group (FRG)," and TS 6.8, "Procedures and Programs." The revisions provide for more efficient use of on-site personnel possessing the requisite experience and qualifications in the review and approval process for plant procedures. The proposed changes are consistent with applicable industry standards included as part of FPL's Quality Assurance program pursuant to 10 CFR Part 50, Appendix B.

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 amendments revise certain administrative controls involved with the on-site programmatic process for review and approval of plant procedures. Specifications that are in place to provide assurance that the unit operating staff qualifications are acceptable, and that written procedures are established, implemented and maintained for safety related activities are not being changed. The revisions are consistent with industry standards established pursuant to 10 CFR Part 50, Appendix B, and do not alter any parameter or equipment performance assumptions that are contained in plant safety analyses to evaluate the initiation or consequences of an accident. Therefore, operation of either facility in accordance with its proposed amendment would 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 amendments will not change the physical plant or the modes of plant operation defined in the Facility License for either St. Lucie unit. Changes proposed for the administrative controls do not involve the addition or modification of equipment nor do they alter the design or operation of plant systems. Therefore, operation of either facility in accordance with its 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.

The proposed amendments revise certain administrative controls involving the on-site programmatic process for review and approval of plant procedures. The scope, or the requirement to establish, maintain, and implement procedures for activities that could affect nuclear safety are not being changed. The proposed changes are consistent with approved industry standards and do not alter the basis for any technical specification that is related to the establishment of, or the maintenance of, a nuclear safety margin. Therefore, operation of either facility in accordance with its proposed amendment would not involve a significant reduction in a margin of safety.

Based on the above discussion and the supporting Evaluation of Technical Specification changes, FPL has determined that the proposed license amendments involve no significant hazards consideration.

