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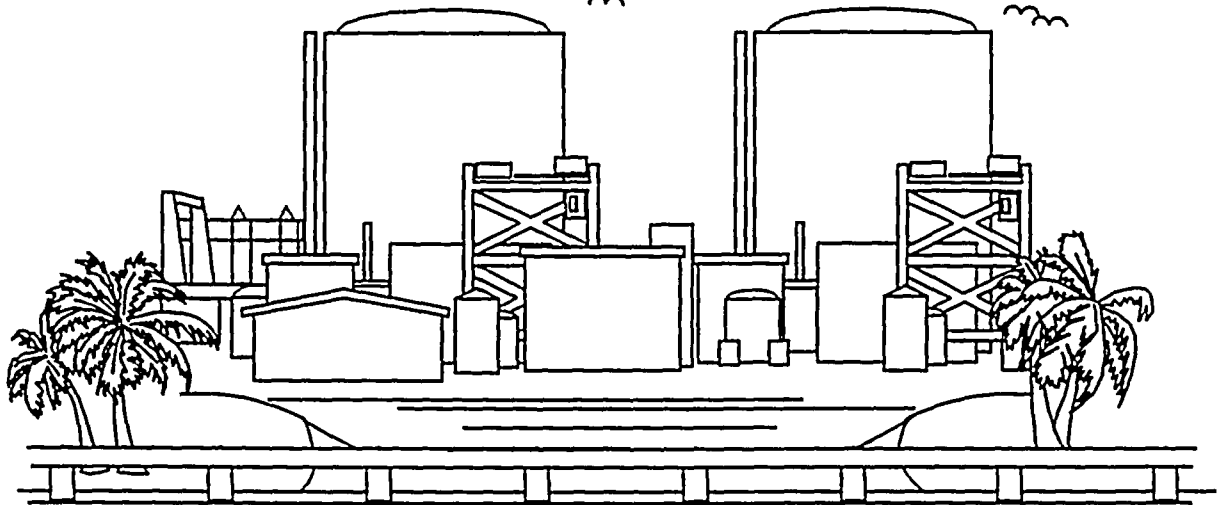
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ADM-17.11
REVISION 0



10 CFR 50.59 SCREENING

ADMINISTRATIVE PROCEDURE

REVISION	REVIEWED BY FRG ON	APPROVED BY	DATE
0	9/18/97	J. Scarola Plant General Manager	9/18/97
		Plant General Manager	

Responsible
Department: **ENGINEERING**

TJB 6/27/97

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1.0 PURPOSE

- 1.1 This procedure defines the 10 CFR 50.59 screening methodology. Any proposed activity that may involve making a change to the facility, facility procedures, or conducting a new test or experiment shall be screened to determine if a 10 CFR 50.59 safety evaluation or a 10 CFR 50.90 license amendment is required, prior to implementation.
- 1.2 Only those individuals listed on the PSL Qualified Reviewers List, maintained by the Training Department, are authorized to perform a 10 CFR 50.59 screening at PSL.

2.0 REFERENCES

NOTE

One or more of the following symbols may be used in this procedure:

- § Indicates a Regulatory commitment made by Technical Specifications, Condition of License, Audit, LER, Bulletin, etc., and shall NOT be revised without Facility Review Group review and Plant General Manager approval.
- ¶ Indicates a management directive, vendor recommendation, plant practice or other non-regulatory commitment that should NOT be revised without consultation with the plant staff.

- 2.1 QI 17-PR/PSL-1, Quality Assurance Records
- 2.2 AP 0010124, Temporary System Alteration Control
- 2.3 AP 0010520, Facility Review Group.
- 2.4 10 CFR 50.59, Changes, Tests, and Experiments
- 2.5 10 CFR 50.90, Application for Amendment of License or Construction Permit

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2.0 REFERENCES (continued)

- 2.6 Nuclear Energy Institute (NEI) 96-07, Draft Revision B, Guidelines for 10 CFR 50.59 Safety Evaluations, July 1997
- 2.7 Nuclear Safety Analysis Center (NSAC) - 105, Guidelines for Design and Procedure Changes in Nuclear Power Plants, July 1986
- 2.8 Nuclear Safety Analysis Center (NSAC) - 125, Guidelines for 10 CFR 50.59 Safety Evaluations, June 1989
- 2.9 NRC Inspection and Enforcement Manual, Part 9800 (I&E 9800), January 1, 1984
- 2.10 NRC Inspection and Enforcement Manual, Part 9900 (Change Notice 96-008), April 9, 1996
- 2.11 SECY - 97 - 035
- 2.12 Condition Report 97-1418

3.0 RESPONSIBILITIES

3.1 Engineering Manager:

- 1. Ensures the plant 10 CFR 50.59 screening programs, implementing procedures, and policies are consistent with the latest industry and NRC screening requirements.
- 2. Ensures the individuals assigned 10 CFR 50.59 screening responsibilities have successfully completed the required training and are adequately qualified, prior to adding their name to the Qualified Reviewers List.
- 3. Ensures 10 CFR 50.59 training is provided to plant personnel, as necessary.

3.2 Qualified Reviewer:

- 1. Verifies name is listed on the site Qualified Reviewers List, prior to performing a 10 CFR 50.59 screening.
- 2. Performs 10 CFR 50.59 screening in accordance with this procedure.

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3.0 RESPONSIBILITIES (continued)

3.3 Training Department:

Maintains the Master copy of the Qualified Reviewers list and ensures all revisions are distributed to each Department Manager, Unit 1 and 2 Control Rooms, and Site Document Control.

4.0 DEFINITIONS

4.1 Appendix B to the Operating License

The latest approved facility Environmental Protection Plan. Review of Appendix B ensures the proposed activity does NOT involve the potential for adverse environmental impact such as hazardous materials being dispersed to the environment.

4.2 Changes in the Facility:

Any change in the facility which alters the design, function, or method of performing the function of a component, system, or structure described in the SAR. This applies to components, systems, and structures described either in the written portion of the SAR or in the drawings contained therein.

4.3 Changes in Procedures:

Pertains NOT only to procedures discussed in the initial operations and organizational chapters of the SAR, but also to other procedural-type commitments, such as the modes and sequences of plant operation described in the SAR, etc. If a procedure results in a deviation from the steps listed in the SAR or will result in a system operation which deviates from the way that a system is described in the SAR, then the change is considered a change in procedures.

4.4 Changes to the Technical Specifications or Operating License:

A change to the Technical Specifications or Operating License includes any change of instructions, values, or intent, including administrative changes.

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4.0 DEFINITIONS (continued)

4.5 Facility:

The facility is defined as those structures, systems, and components within the boundary of the St. Lucie Plant site. This includes but is NOT limited to the containment building, the power block, the switchyard, the parking lots, the mangroves, the sand dunes, the warehouses, etc.

4.6 NRC Safety Evaluation Reports (SERs)

NRC Safety Evaluation Reports were initially issued in support of obtaining operating license approval. Subsequent to obtaining the operating license, additional SERs have been issued in support of license amendments. Currently, except for those SER's recently issued by the NRC, a Qualified Reviewer can typically assume the relevant portions of all SER's have been incorporated into the UFSAR via the update process.

4.7 Operating License (OL)

The Operating License is the license, and conditions as amended, granted by the NRC for operation of the unit. There is an Operating License for each St. Lucie Plant unit.

4.8 Passive Activity:

Any activity that does NOT meet the defined conditions of a Proposed Activity (i.e., does NOT involve a change to the facility, does NOT change a facility procedure, and does NOT involve a new test or experiment). Activities typically considered passive include cleaning, lubrication, painting, like-for-like equipment change-out, electronic monitoring, equipment testing, and administrative corrections made in accordance with QI-5-PSL-1, Preparation, Revision, Review/Approval of procedures. Passive activities are NOT required to be screened.

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4.0 DEFINITIONS (continued)

4.9 Procedures:

FRG reviewed and PGM approved documents that provide instructions regarding the operation, maintenance, and testing of the facility. This includes but is NOT limited to the following documents:

1. Quality Instructions
2. Administrative procedures
3. Operating procedures
4. Off-normal procedures
5. Emergency procedures
6. Test procedures
7. Calibration procedures
8. Maintenance procedures
9. Annunciator Response procedures
10. Chemistry procedures
11. Health Physics procedures
12. Surveillance procedures
13. Letters of Instruction
14. In-Service Pressure Test Packages
15. Portions of Technical Manuals Used As Approved Procedures.

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4.0 DEFINITIONS (continued)

4.10 Proposed Activity:

Any activity (i.e., change, test, or experiment) that may involve either changing the facility, or changing facility procedures, or conducting a new facility test or experiment. Examples of activities that typically would require screening include welding, re-wiring, equipment setpoint changes, modifications to Systems, Structures or Components (SSCs), operating changes to equipment and systems. Changes to the facility or changes to facility procedures include both temporary and permanent changes.

4.11 Qualified Reviewer:

1. Any person that meets the 10 CFR 50.59 screening training requirements, possesses the requisite experience to competently analyze the proposed change/activity, and is authorized by the Engineering Manager (i.e., name is on the PSL Qualified Reviewers List).
2. The PSL list of Qualified Reviewers is maintained by the Training Department.

4.12 Safety Analysis Report (SAR)

1. The NRC grants a license to operate a nuclear power plant facility based on information provided by the licensee. For the purposes of 10 CFR 50.59 screening, the SAR is considered to include the following documents:
 - A. Technical Specification BASES
 - B. Updated Final Safety Analysis Report (UFSAR)
 - C. NRC Safety Evaluation Reports (SER's)
 - D. Appendix B to the Operating License
2. Per SECY-97-035, the SAR does NOT have to be considered to include the radiological emergency plan, security plan, or the Appendix B program, since changes to these programs are covered by 10 CFR 50.54.

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4.0 DEFINITIONS (continued)

4.13 Screening Criteria:

1. Does the proposed activity involve changes to the Technical Specification or Operating License?
2. Does the proposed activity involve making changes to the facility or procedures as described in the SAR?
3. Does the proposed activity involve a test or experiment NOT described in the SAR?

4.14 Support Activity:

Any activity performed in direct support of, or for the sole purpose of, supporting another activity. Each support activity must be considered on a case-by-case basis when determining if a 10 CFR 50.59 screening is required. Support activities such as scaffolding, temporary changes to systems or procedures, etc. may NOT meet the defined conditions of a Passive Activity (i.e., may involve either a change to the facility, a change to facility procedures, or involve a new facility test or experiment).

4.15 Technical Requirements Manual

The controlled document that contains copies of approved technical specification amendments removing requirements from the St. Lucie technical specifications.

4.16 Technical Specifications (TS's)

The Technical Specifications identify the plant's Limiting Safety System Settings, Limiting Conditions for Operation, Surveillance Requirements, Design Features, and Administrative Requirements. Included in each unit's TS's are the BASES or summary statements, that provide the reason for TS requirements.



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4.0 DEFINITIONS (continued)

4.17 Tests and Experiments

Pertains to the performance of tests or experiments that may affect the safe operation of the plant but were NOT described in the SAR. By regulatory definition, these are tests and experiments which could potentially degrade the margins of safety during normal operations or anticipated transients or degrade the adequacy of structures, systems, or components to prevent accidents or mitigate accident conditions.

4.18 Updated Final Safety Analysis Report (UFSAR)

The UFSAR includes the description of the facility, procedures, tests, experiments, supporting analysis, and evaluations, used by the NRC in its approval process to grant the operating license, and all changes approved in accordance with 10 CFR 50.59 and 10 CFR 50.90. Note that changes to the UFSAR are required to be submitted to the NRC within six months following refueling outages NOT to exceed 2 years since the last update. For the purposes of screening, the UFSAR encompasses all changes approved including those NOT yet physically incorporated into the pages of the UFSAR.

4.19 10 CFR 50.59 Screening:

The documented analysis of a proposed activity, prior to implementation, to determine if a 10 CFR 50.59 safety evaluation or a 10 CFR 50.90 license amendment is required.

5.0 RECORDS REQUIRED

5.1 The following records shall be maintained in the plant files in accordance with QI 17-PR/PSL-1, Quality Assurance Records:

1. Appendix A

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6.0 INSTRUCTIONS

6.1 General Information

1. The 10 CFR 50.59 screening is designed to determine and document if a 10 CFR 50.59 safety evaluation or a 10 CFR 50.90 license amendment is required, prior to implementing a proposed activity.
 - A. It is considered prudent to be conservative when determining if a safety evaluation or license amendment is required. If it is unclear, whether the proposed activity requires a safety evaluation or license amendment, the default should be to obtain an Engineering review.
 - B. Screening results must be clearly documented in sufficient detail to permit an independent reviewer to reconstruct the basis for the original reviewer's disposition.
 - C. When screening a proposed activity, the intermediate plant configurations during implementation shall be considered.
2. Only those individuals that meet the 10 CFR 50.59 training requirements and authorized by the Engineering Manager (i.e., name is on the PSL Qualified Reviewers List) are permitted to perform a 10 CFR 50.59 screening. The PSL Qualified Reviewers List is maintained by the Training Department.

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6.0 INSTRUCTIONS (continued)

6.1 General Information (continued)

3. In accordance with federal regulations, the UFSAR is amended every 18 months to include the most recent changes. Accordingly, the current amendment of the UFSAR may not reflect approved changes that are up to 18 months old. This lag in amending the UFSAR is of particular concern in the case of License amendments that relocate material from the technical specifications to the UFSAR. In this case a review of the technical specifications and current amendment of the UFSAR would not identify that the subject material was described in the SAR. To address this concern, reviewers performing 10 CFR 50.59 screening must review the PSL Technical Requirements manual. This controlled document contains copies of approved license amendments that have relocated technical specification requirements to the UFSAR. All former technical specification requirements that have been approved to be relocated to the UFSAR (regardless of whether these changes are physically contained in the current UFSAR amendment) must be considered to be part of the SAR for the purposes of 10 CFR 50.59 screening.

END OF SECTION 6.1

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6.0 INSTRUCTIONS (continued)

6.2 10 CFR 50.59 Screening

1. A 10 CFR 50.59 screening is accomplished by:
 - A. Asking the following questions (or words of a similar intent) concurrent with the review of the Technical Specifications, Operating License, and Safety Analysis Report:
 1. Question 1: Does the proposed activity involve changes to the Technical Specifications or Operating License?
 2. Question 2: Does the proposed activity involve making changes to the facility or procedures as described in the SAR?
 3. Question 3: Does the proposed activity involve conducting tests or experiments NOT described in the SAR?
 - B. Documenting 10 CFR 50.59 screening results and associated supporting references on a form similar to Appendix A.
2. The responses to the above questions will determine the type of evaluation and approval required, **PRIOR** to implementing the proposed activity:
 - A. If the response to Question 1 is YES:
 1. The activity can NOT be performed under the 10 CFR 50.59 process.
 2. A 10 CFR 50.90 license amendment and NRC approval is required, prior to implementing the proposed change. Literally, no change can be made to Technical Specifications or the Operating License without prior NRC approval. Even seemingly minor editorial changes must be submitted as a Proposed License Amendment.

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6.0 INSTRUCTIONS (continued)

6.2 10 CFR 50.59 Screening (continued)

2. (continued)

- B.** If the response to Question 1 is NO, and either Question 2 or Question 3 is YES, a 10 CFR 50.59 safety evaluation is required to determine if prior NRC approval is required for implementation of the proposed activity.
- C.** If the responses to Question 1, Question 2, and Question 3 are NO, neither a license amendment nor a safety evaluation is required for implementation of the proposed activity. A proposed activity is considered successfully screened when the responses to all three questions are NO.

END OF SECTION 6.2

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6.0 INSTRUCTIONS (continued)

6.3 Changes to the Facility or Procedures as Described in the Safety Analysis Report (SAR)

1. If the SAR text, tables, or figures contain sufficient detail regarding a structure, system, component, or procedure such that it can be reasonably concluded that the proposed activity represents a change to that detail, it is considered to be a change to the facility or procedures as described in the SAR.
2. If the analysis of the proposed activity concludes that other structures, systems, components or procedures described in the SAR are NOT directly related to the change but may be adversely affected, then it is considered to be a change to the facility or procedures as described in the SAR.
3. In reviewing the SAR, it is common to find the proposed activity being reviewed in several sections. When this occurs, it is important to analyze each applicable section against the proposed activity and draw a conclusion regarding the overall affect on the SAR.
 - A. When analyzing more than one section of the SAR against a proposed activity, it may be useful to characterize the affect(s) on each section of the SAR into the following categories and draw an overall conclusion:
 1. **POSITIVE AFFECT** - The proposed activity is considered a change to the facility or procedures as described in the SAR.
 2. **NEUTRAL AFFECT** - The SAR description does NOT provide sufficient detail to conclude that the proposed activity is a change.
 3. **NEGATIVE AFFECT** - The proposed activity is NOT considered a change to the facility or procedures as described in the SAR.

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6.0 INSTRUCTIONS (continued)

6.3 Changes to the Facility or Procedures as Described in the Safety Analysis Report (SAR) (continued)

3. (continued)

- B. When analyzing more than one section of the SAR against a proposed change, the final conclusion should be based on discounting the neutral affect(s) and comparing the positive affect(s) with the negative affect(s).**

END OF SECTION 6.3

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6.0 INSTRUCTIONS (continued)

6.4 Conducting a New Test or Experiment

1. If after analysis of the SAR text, tables, and figures it can NOT be reasonably concluded that the test or experiment is adequately described in the SAR, then the proposed activity is considered conducting a new test or experiment.
2. The scope of conducting a new test or experiment does NOT include the following type of tests or experiments:
 - A. Minor tests or experiments performed for convenience within the PSL site boundaries (e.g., testing pH of intake water).
 - B. Those that do NOT involve or affect the facility or its procedures.
3. Changes to previously evaluated tests or experiments currently identified in existing plant procedures are NOT considered new tests or experiments, provided the tests or experiments are governed by the same conditions as previously evaluated. These types of changes shall be screened as procedure changes.

END OF SECTION 6.4

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6.0 INSTRUCTIONS (continued)

6.5 10 CFR 50.59 Screening Documentation Requirements

1. The basis for the 10 CFR 50.59 screening conclusion shall be documented such that an independent qualified reviewer could reach the same conclusion based solely on the identified references and documented information. This includes but is NOT limited to:
 - A. Identifying the significant/pertinent section(s) of the UFSAR, Operating License, and Technical Specifications.
 - B. Documenting and, when possible, quantifying the use of experience or engineering judgement.
 - C. Identifying other relevant information, when applicable.
2. The qualified reviewer should avoid the inclination to support a NO answer by simply reversing the word order of the question such that it becomes a simple statement of conclusion rather than a basis explanation.
 - A. Following are some typical examples of suggested basis statements that may be used when neither a 10 CFR 50.59 safety evaluation nor a 10 CFR 50.90 license amendment is required:
 1. If changes to the facility or facility procedures are involved:
 - a. The Technical Specifications, Operating License, and SAR documents have been reviewed and reference to the structures, systems, components, and procedures involved with the proposed activity (or its effects) can NOT be found in the following section(s), table(s), or figure(s) _____.

OR

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6.0 INSTRUCTIONS (continued)

6.5 10 CFR 50.59 Screening Documentation Requirements

2. (continued)

A. (continued)

1. (continued)

b. The Technical Specifications, Operating License, and SAR documents have been reviewed, and reference to the structures, systems, components, and procedures involved with the proposed activity (or its effects) were found in the following section(s), table(s), or figure(s) _____ . It is the judgement of the reviewer that these references when compared to the proposed activity, do NOT represent a change to the facility or a facility procedure.

2. If a new facility test or experiment is involved:

a. Upon analysis of the following Technical Specifications, Operating License, and SAR section(s), table(s), or figure(s) _____ , the new facility test/experiment is judged by the reviewer to be adequately described in the SAR and is NOT considered conducting a new test or experiment.

END OF SECTION 6.5

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APPENDIX A
10 CFR 50.59 SCREENING
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FSAR Section(s), Table(s) or Figure(s) Reviewed:	Technical Specification Sections Reviewed
_____	_____
_____	_____
_____	_____

The following questions shall be completed in accordance with 0-ADM-17.11, 10 CFR 50.59 Screening:

	<u>YES</u>	<u>NO</u>
A. Does the proposed activity involve changes to the Technical Specifications or Operating License?	___	___
B. Does the proposed activity involve making changes to the facility or procedures as described in the SAR?	___	___
C. Does the proposed activity involve conducting tests or experiments NOT described in the SAR?	___	___

- Notes:
1. A YES answer to Question A mandates a 10 CFR 50.90 license amendment and NRC approval, prior to implementing the proposed activity.
 2. A YES answer to Question B or C mandates a 10 CFR 50.59 safety evaluation, prior to implementing the proposed activity.
 3. If all answers are NO, a Safety Evaluation is NOT required.

Provide Written Discussion Supporting Checklist Responses: (Attach additional pages, as necessary)

Reviewed By: _____ / _____ _____ /_____/_____

Signature Print Name Dept Date

