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SUBJECT: Supplemental application to 961031 proposed amend to licenses DPR-67 7 NPF-16, providing for more efficient use of on-site mgt personnel in review & approval process for plant procedures.

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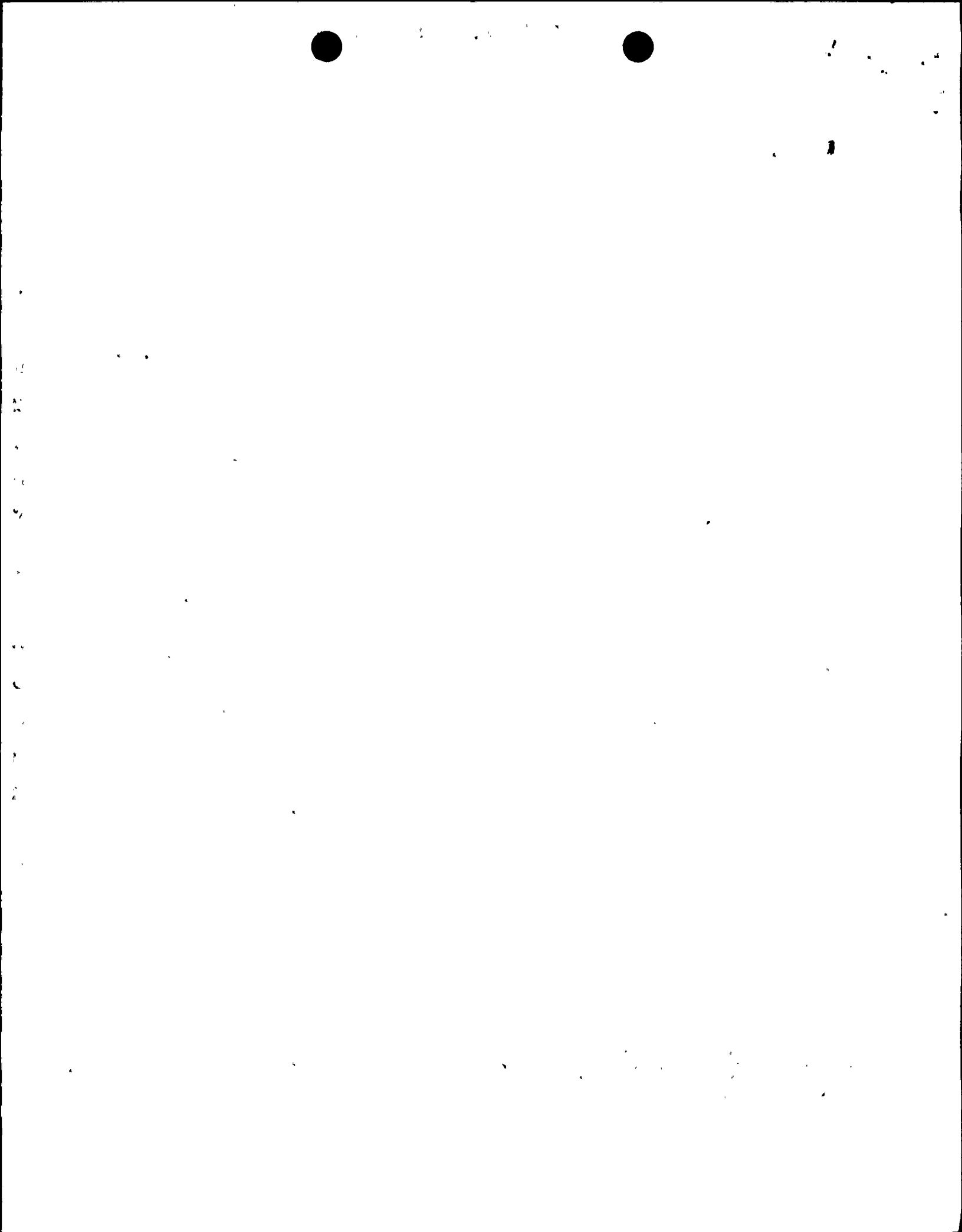
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May 27, 1998

L-98-072  
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  
(TAC Nos. M97209/M97210), Changes to Original Request

- Ref: (1) FPL Letter L-96-256, J.A. Stall to NRC (DCD): Proposed License Amendment, Onsite Facility Review Group; October 31, 1996.
- (2) FPL Letter L-97-271, J.A. Stall to NRC (DCD): Proposed License Amendments: Onsite Facility Review Group (TAC Nos. M97209/M97210), Request for Additional Information; October 31, 1997.
- (3) NRC Letter, L.A. Wiens to Thomas F. Plunkett (FPL), SUBJECT: PROPOSED LICENSE AMENDMENT REGARDING ONSITE FACILITY REVIEW GROUP ST. LUCIE UNITS 1 AND 2 (TAC NOS. M97209 AND M97210); February 12, 1998.

Reference 1 is an application for license amendment from Florida Power and Light Company (FPL) which will provide for more efficient use of on-site management personnel in the review and approval process for plant procedures. Specifically, changes are proposed for Technical Specifications (TS) 6.5.1, Facility Review Group (FRG), and 6.8, Procedures and Programs. Reference 2 provided additional information requested by the NRC staff relative to FPL's application for amendment. In Reference 3, the NRC staff requested that FPL revise the proposed TS changes to delete the authority of the FRG to approve new procedures or changes to procedures, and to make certain changes to the Topical Quality Assurance Report (TQAR). In addition, the staff addressed certain procedural enhancements that should be included in the administrative control process for individuals authorized by the Plant General Manager to approve changes to procedures. This submittal is a supplement to Reference 1 and is made in response to Reference 3.

Attachment 1 contains a description of the changes to the proposed license amendment request. Attachments 2 and 3 contain copies of the affected TS pages marked-up to show the changes, and should be used in lieu of those submitted in Attachments 3 and 4, respectively, of Reference 1. Attachment 4 contains a proposed revision to the Updated Final Safety Analysis Report for each St. Lucie unit. The revisions contained herein result in no change to the arguments or conclusions of the No Significant Hazards Consideration evaluation previously submitted in Reference 1, and subsequently published in Federal Register Vol. 61, No. 244, Page 66707, Wednesday, December 18, 1996, Notices.

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The proposed TS changes 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), a copy of this supplement is being forwarded to the State Designee for the State of Florida.

Please contact us if there are any questions concerning this matter.

Very truly yours,



J.A. Stall  
Vice President  
St. Lucie Plant

JAS/RLD

Attachment

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

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 27<sup>th</sup> day of May, 19 98

by J. A. Stall, who is personally known to me.

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



Leslie J. Whitwell  
MY COMMISSION # CC646183 EXPIRES  
May 12, 2001  
BONDED THRU TROY FAUN INSURANCE, INC.

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



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## Introduction

The proposed amendment (Reference 1) 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 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. The following proposed changes to the TS include those contained in Reference 1, as revised in response to the NRC staff request of Reference 3. In addition, FPL proposes to include certain elements of the procedure review process in Chapter 17 of the Updated Final Safety Analysis Report (UFSAR) for each St. Lucie unit and to enhance the administrative controls involving individuals authorized to approve written procedures.

## Proposed Technical Specification Changes for PSL1 and PSL2

Copies of the affected TS pages, marked-up to show the changes, are contained in Attachments 2 and 3 to this submittal, and replace those previously submitted in Attachments 3 and 4 of Reference 1.

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." The proposed change to this Specification and basis for the request remain the same as previously described in References 1 and 2:

***(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 applies to PSL2 only). The proposed revision contained in Reference 1 would have granted authority to the FRG to approve items considered under Specifications 6.5.1.6.a through d. [and m.], and is hereby withdrawn. TS 6.5.1.7.a will remain as stated in the existing facility operating license.



TS 6.5.1.8, RECORDS: The "*Plant General Manager*," is added to the last sentence, which identifies recipients of the FRG minutes. The proposed revision and basis for the request remain the same as previously described in Reference 1.

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:

**6.8.2 Review and Approval of Procedures: Each new procedure of Specification 6.8.1.a through i. above shall be independently reviewed by an individual or group from the appropriate discipline(s), and shall be reviewed by the FRG. New procedures shall be approved by the Plant General Manager or individuals designated in writing by the Plant General Manager prior to implementation. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.**

*(Reference 1) ~~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.~~*

This proposed revision to TS 6.8.2 differs from that of Reference 1 to reflect deletion of the prior proposal to grant the FRG authority to approve new procedures, and is consistent with the staff's position stated in Reference 3. Words involving independent review have been added for clarification, i.e., to distinguish between the FRG review and the review performed by the applicable discipline(s) for technical accuracy, and are consistent with proposed TS 6.8.3.a. In addition, the exception for fire protection program implementing procedures (TS 6.8.1.f) proposed for this specification in Reference 1 has been deleted since the approval process for these procedures is not unique relative to the requirements for review and approval of other written procedures (Reference 2, Item No. 11).

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

**6.8.3 Changes to Procedures**

- a. Each revision to the procedures of Specification 6.8.1.a through i. above shall be independently reviewed by an individual or group from the appropriate discipline(s), and revisions that require a written safety evaluation pursuant to 10 CFR 50.59 shall be reviewed by the FRG. Procedure revisions shall be approved by the Plant General Manager or individuals designated in writing by the Plant General Manager prior to implementation.
- b. Temporary changes to procedures of Specification 6.8.1a 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 Specification 6.8.3.a.

*(Reference 1) ~~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.~~*

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This proposed change to TS 6.8.3.a differs from that of Reference 1 to clarify that "safety evaluation" means conformance to 10 CFR 50.59 (Reference 2, Item No. 5.a). In addition, the statement addressing the management level of personnel authorized to approve changes to procedures that was proposed for this Specification in Reference 1 has been deleted. Consistent with Reference 3, the minimum functional level(s) and qualifications for individuals designated to approve procedures and procedure changes will be addressed in the Quality Instructions and/or Administrative Procedures that describe the process for review and approval of procedures and procedure changes. Proposed TS 6.8.3.b and the basis for this request remains the same as previously described in References 1 and 2.

**Proposed Revision to PSL1 [PSL2] Updated Final Safety Analysis Report (UFSAR)**

Attachment 4 contains the proposed changes to the St. Lucie Unit 1 and Unit 2 UFSARs.

In order to complete the NRC staff review of FPL's request for license amendment, the staff requested in Reference 3 that FPL submit certain changes to the Topical Quality Assurance Report (FPLTQAR) as an attachment to this submittal. However, the FPLTQAR is an upper-tier document that delineates the generic requirements and responsibilities by which FPL implements the corporate Quality Assurance Program, and the FPLTQAR applies to all of FPL's nuclear plants and supporting departments. Contrary to the generic nature of the FPLTQAR, the requested change to the topical report would be unique to the St. Lucie units and the level of detail desired by the staff would not be consistent with the general format of the report. Therefore, FPL proposes that the information requested by the NRC staff be incorporated into Chapter 17, "Quality Assurance," of the UFSAR; specifically, FPL will revise Section 17.2, "Quality Assurance During the Operations Phase," to address the qualified reviewer program, screening process and the process for independent and interdisciplinary review of procedure changes.

Section 17.2 of the UFSAR currently includes a description of the FPL quality assurance program implemented pursuant to 10 CFR 50.34(b)(6)(ii) by referencing the FPLTQAR: "17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE. The generic elements of the FP&L Quality Assurance Program are described in the FP&L Topical Quality Assurance Report (FPLTQAR) 1-76A. The Topical QA Report defines departmental responsibilities by which FP&L implements the corporate QA Program, and is an integral part of the Corporate Quality Assurance Manual (FPL-NQA-100A)." Any elements of the quality assurance program described or referenced in the UFSAR are subject to the regulatory controls specified in 10 CFR 50.54(a). The proposed change to the UFSAR shown in Attachment 4 of this submittal, if approved, will constitute elements

of the quality assurance program that are described in the UFSAR and will likewise be subject to these same controls. Therefore, FPL believes the proposed change to the UFSAR for each St. Lucie unit is equivalent to the FPLTQAR change requested by the NRC staff in Reference 3. If the request for license amendment is approved, the revisions proposed for the UFSAR will be incorporated as part of the next periodic update for each unit 's UFSAR pursuant to the requirements of 10 CFR 50.71(e) .

It should be noted that the qualified reviewer program, screening process and the process for independent review of procedure changes, including provisions for interdisciplinary review, are currently provided for in existing plant Quality Instructions and/or Administrative Procedures, e.g., QI-5-PSL-1 "Preparation, Revision, Review/Approval of Procedures" and ADM-17.11 "10 CFR 50.59 Screening." A description of these processes was also provided to the NRC staff in Reference 2, Item Nos. 5.c, 5.d, and 6.

### Procedural Controls

In addition to the requested FPLTQAR revision, Reference 3 states that "the process for authorizing individuals to approve changes to procedures should be administratively controlled by a procedure that addresses, as a minimum, ANSI/ANS-3.1 qualification requirements, assurance that authorized individuals are knowledgeable in the technical and functional area(s) affected by a procedure change, and assurance that individuals do not prepare or review procedures that they approve. In addition, the authorized individuals should be responsible for advising the Plant General Manager of the safety significance of a procedure change prior to implementation."

Upon implementation of a license amendment that permits the Plant General Manager to extend his/her procedure approval authority while retaining his/her overall responsibility for plant safety, FPL will revise the Quality Instruction(s) and/or Administrative Procedure(s) that have been established to administratively control the procedure/procedure change process to (1) address the minimum functional level(s) and applicable ANSI/ANS qualifications required for individuals authorized by the Plant General Manager to approve procedures and procedure changes, (2) provide assurance that such individuals have acceptable knowledge in the technical and functional area(s) affected by procedures and procedure changes that they approve, and (3) require that such individuals do not perform the required independent technical reviews for procedures and procedure changes that they approve. In addition, individuals authorized by the Plant General Manager to approve changes to procedures will be responsible for advising the Plant General Manager of any change, prior to its implementation, that has safety significance.

### Conclusion

FPL submitted a request for license amendment (Reference 1) that would revise the responsibilities and authority for review and approval of written plant procedures. The NRC staff determined that the proposed process for approval of plant procedures by the Facility Review Group is not consistent with the staff's position on this matter (Reference 3). In addition, the staff requested that FPL revise its Topical Quality Assurance Report to describe specified elements of the procedure review process, and further suggested that FPL procedurally address certain administrative controls regarding individuals authorized to approve procedures.

The proposed changes to the St. Lucie Unit 1 and Unit 2 Technical Specifications contained in FPL's request for license amendment (Reference 1) are modified by this submittal to accommodate the staff position stated in Reference 3. Due to the plant specific nature and desired level of detail describing elements of the procedure review process specified in Reference 3, FPL proposes to incorporate these elements into the Quality Assurance section (Chapter 17) of the UFSAR for each St. Lucie unit as an equivalent alternative to revising the FPL Topical Quality Assurance Report. If the request for license amendment is approved, the revisions proposed for the UFSAR will be incorporated as part of the next periodic update for each unit 's UFSAR pursuant to the requirements of 10 CFR 50.71(e) . During the implementation phase of the approved amendment, FPL will revise the appropriate Quality Instruction(s) and/or Administrative Procedure(s) to address administrative controls involving individuals authorized to approve written procedures.