

# CATEGORY 1

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AUTH. NAME      AUTHOR AFFILIATION  
STALL, J.A.      Florida Power & Light Co.  
RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Application for amends to licenses DPR-67 & NFP-16, revising TS 6.2.2.f to allow use of longer operating shifts of up to twelve hours duration by plant's operating crews.

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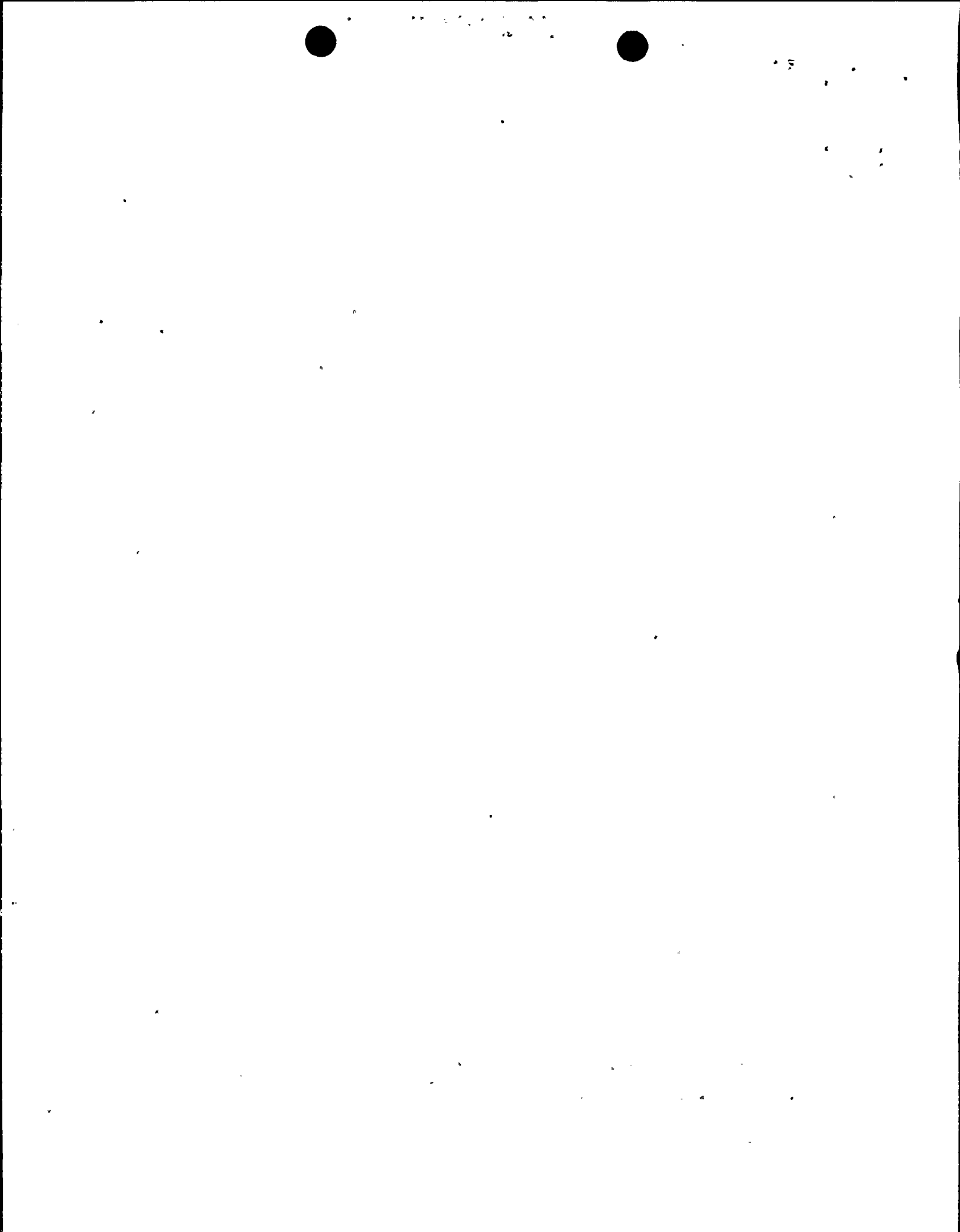
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May 27, 1998

L-98-130  
10 CFR 50.90

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

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Proposed License Amendments  
Operations Shift Schedules

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-67 and NPF-16 be amended to modify the St. Lucie Units 1 and 2 Technical Specifications by deleting the Technical Specification 6.2.2.f. requirement "...to have operating personnel work a normal 8 hour day, 40 hour week while the plant is operating." The proposed change will allow FPL to implement various controlled shift structures and durations during a nominal (36 to 48 hours) work week. The proposed changes will allow the use of up to 12 hour shifts without routine heavy use of overtime. The Technical Specifications will continue to require the controls and guidelines for work hours to be contained in administrative procedures.

FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR 50.92. A description of the requested amendments is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specification changes is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications.

In accordance with 10 CFR 50.91(b)(1), a copy of these proposed license amendments are being forwarded to the State Designee for the State of Florida. The proposed license amendments have been reviewed by the St. Lucie Facility Review Group and the FPL Company Nuclear Review Board. Should there be any questions on this request, please contact us.

Very truly yours,

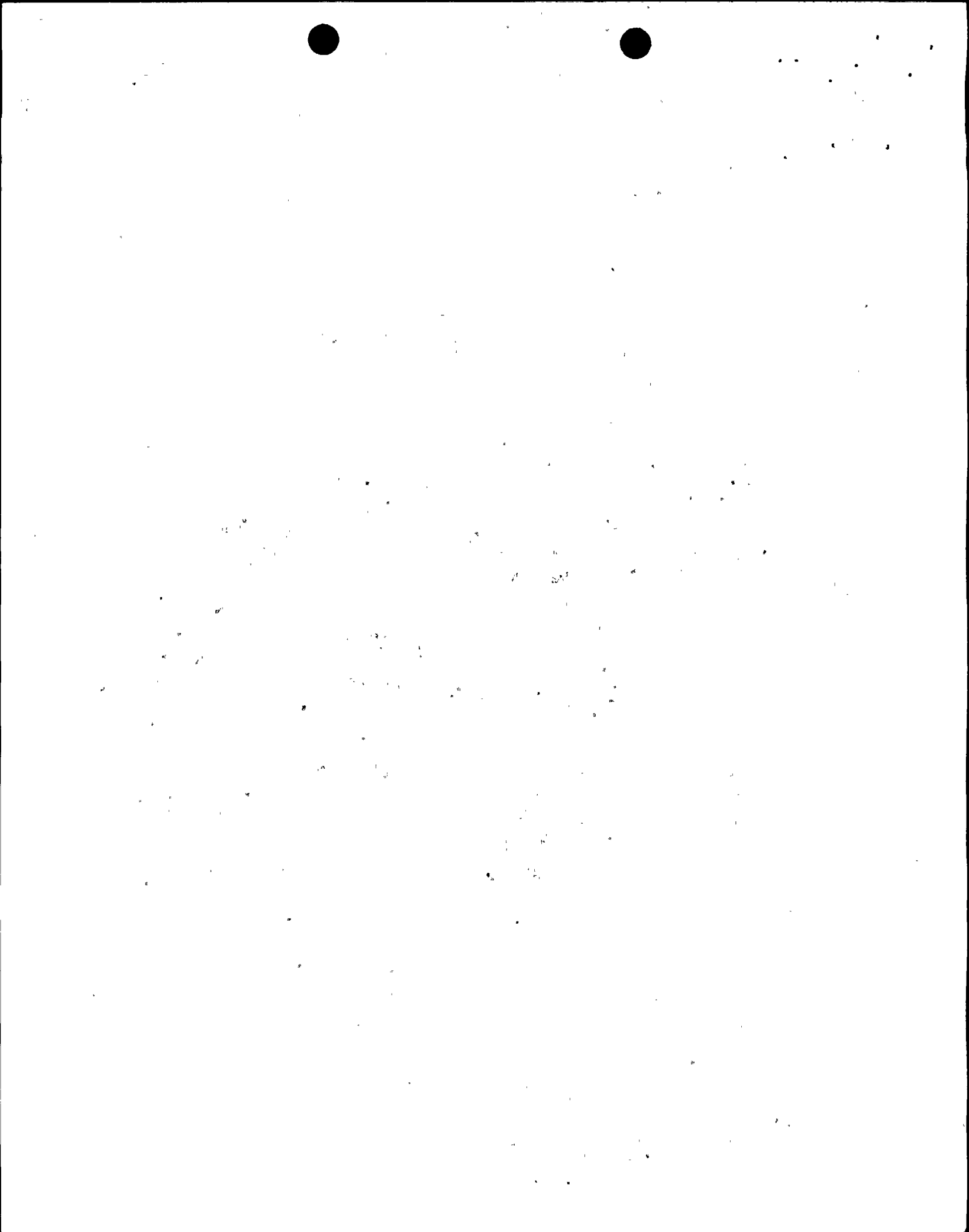
J. A. Stall  
Vice President  
St. Lucie Plant

JAS/EJW

000102

Attachments

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PDR ADOCK 05000335  
P PDR



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cc: Regional Administrator, Region II, USNRC

Senior Resident Inspector, USNRC, St. Lucie Plant

W. A. Passetti, Florida Department of Health and Rehabilitative Services



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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 27 day of May, 1998

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 FAIR INSURANCE, INC.

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



PA 12-10-1974



## ATTACHMENT 1

### DESCRIPTION OF AMENDMENTS REQUEST

#### 1.0 Introduction

Florida Power and Light Company (FPL) is requesting that Appendix A of Facility Operating Licenses DPR-67 and NPF-16, for St. Lucie Units 1 and 2, respectively, be revised to allow for the use of longer operating shifts of up to 12 hours duration by the plant's operating crews. The longer shifts would result in a reduced number of shift turnovers each day and result in more efficient shift-to-shift communications and continuity. From a quality of life perspective, longer shift schedules result in more consecutive days off between work periods and more rested personnel. The implementation of longer shifts would result in plant operators working a nominal 40 hour week (e.g., three consecutive 12 hour days or four consecutive 12 hour days) during normal plant operation.

Changes are proposed to revise St. Lucie Units 1 and 2 Technical Specifications (TS) Administrative Controls, Section 6.2.2.f, to delete the requirement "...to have operating personnel work a normal 8 hour day, 40 hour week while the plant is operating." The proposed change will allow FPL to implement various controlled shift structures and durations during a nominal (36 to 48 hours) work week. The proposed changes will allow the use of up to 12 hour shifts without routine heavy use of overtime. The TS will continue to require the controls and guidelines for work hours to be contained in administrative procedures.

#### 2.0 Proposed Changes: Description and Bases/Justification

##### 2.1 Background

On February 11, 1982, the NRC published in the Federal Register (47 FR 7352) the "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors." In June 1982, the NRC revised the policy and subsequently disseminated the revision in Generic Letter 82-12, "Nuclear Plant Staff Working Hours," which recommended that licensees incorporate specific working hour limits in plant TS to minimize the potential for personnel errors resulting from fatigue. The staff subsequently determined that few events at U. S. nuclear plants have been attributed to inadequate control of working hours and that control of working hours through administrative procedures provides reasonable assurance that personnel overtime will not jeopardize safe plant operation. Control of overtime through administrative procedures is consistent with Action Item I.A.1.2.1, "Limit Overtime," of NUREG-0737, "Clarification of TMI Action Plan Requirements," dated November 1980. St. Lucie Units 1 and 2 TS 6.2.2.f. include specific limits on the number of hours an individual

can be at work in a 24-hour period, 48-hour period, and any 7- day period. St. Lucie Units 1 and 2 Technical Specifications 6.2.2.f. state:

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modification, on a temporary basis the following guidelines shall be followed:
1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
  2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
  3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
  4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant-Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

St. Lucie Units 1 and 2 now work an 8 hour operator shift schedule. Each day, there are three shift-to-shift turnovers from one operating crew to its relief. FPL desires to have the option of using up to a 12 hour shift schedule which would reduce the number of shift-to-shift turnovers. While the change to longer shifts is focused on quality of life improvements for the plant's operators, the fewer number of shift-to-shift turnovers will reduce the potential for miscommunication and errors.

## 2.2 Description of Changes

The following changes in each unit's TS, included in Attachment 3, are proposed:

### TS 6.2.2 PLANT STAFF

REVISE Technical Specification 6.2.2.f, to read (revisions only presented below):

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

~~The administrative procedures shall include guidelines on working hours that ensure that Adequate shift coverage shall be is maintained without routine heavy use of overtime for individuals.~~ The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

There are no additional proposed changes to the balance of Technical Specification 6.2.2.f.

## 2.3 Basis/Justification for Proposed Changes

Specific working hours are not required to be included in the TS under 10 CFR 50.36(c)(5), "Administrative Controls." The NRC policy is that licensees are to establish controls to ensure that personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision making capability. The NRC staff has found, in license amendments issued on other dockets (including Turkey Point Units 3 and 4), that shifts of 12 hours duration have not significantly impaired personnel performance, provided the overtime guidelines and controls are observed, as incorporated in the St. Lucie Units 1 and 2 TS and restated above. The proposed license amendment does not change the overtime limits TS and FPL proposes to retain the limits on the use of overtime and the administrative controls which implement the Technical Specification requirements.

The proposed changes to TS 6.2.2.f. will permit FPL to implement operating shifts of up to 12-hours duration and will result in quality of life improvements for the plant's operators. The longer shifts will result in more consecutive days off between the alternating three and four day work weeks, resulting in more rested operating crews. Additionally, the fewer number of shift-to-shift turnovers will reduce the potential for miscommunication and errors.



The proposed changes to TS 6.2.2.f. will not allow the routine heavy use of overtime and the limits that are placed on overtime for each individual have not been altered. Since the controls on overtime will be retained, the proposed St. Lucie Units 1 and 2 TS provide reasonable assurance that personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision making capability. Therefore, FPL proposes that the TS be revised to allow for the use of 12 hour shifts by the plant's operating crews.

### 3.0 Environmental Consideration

The proposed license amendments do not change limitations with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, nor do they change surveillance requirements for facility equipment. The proposed amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendments involve no significant hazards considerations and meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and that, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendment.

### 4.0 Conclusion

This proposed change will allow FPL to implement different shift duration structures. FPL is proposing to delete the requirement which stipulates 8 hour shifts. The proposed TS changes will allow St. Lucie Plant Operations personnel to work a regularly scheduled shift rotation of up to 12-hour duration, resulting in quality of life improvements for the plant's operators.

## ATTACHMENT 2

### NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

#### DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-67 and NPF-16 be amended to modify the St. Lucie Units 1 and 2 Technical Specifications (TS) to delete the TS 6.2.2.f. requirement "...to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating." The proposed changes will allow FPL to implement various controlled shift structures and durations during a nominal (36 to 48 hours) work week. The proposed changes will allow the use of up to 12 hour shifts without routine heavy use of overtime. The TS will continue to require the controls and guidelines for work hours to be contained in administrative procedures.

#### INTRODUCTION

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92 (c)). A proposed amendment to an operating license for a facility 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 below for the proposed amendments.

#### DISCUSSION

- (1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendments will delete the TS 6.2.2.f. requirement "...to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating." The proposed change will allow FPL to implement various controlled shift structures and durations during a nominal (36 to 48 hours) work week. The proposed changes will allow the use of up to 12 hour shifts without routine heavy use of overtime. The TS will continue to require the controls and guidelines for work hours to be contained in administrative procedures. The proposed amendments do not involve a change to any structure, system, or component that affects the probability or consequences of an accident previously evaluated.

The proposed amendments are administrative in nature and do not involve a significant increase in the probability or consequences of any accident previously evaluated.

- (2) Operation of the facility in accordance with the proposed amendments 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 modes of plant operation and therefore, will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendments will not result in the addition or modification of equipment for any systems, structures, or components at St. Lucie.

The proposed changes modify the controls on working hours for operating personnel without significantly changing the hours worked on a weekly or annual basis, and do not alter the current guidelines on the use of overtime. The changes are administrative in nature. Consequently, operation of either unit in accordance with the 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 amendments would not involve a significant reduction in a margin of safety.

The proposed amendments will delete the TS 6.2.2.f. requirement "...to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating." The proposed change will allow FPL to implement various controlled shift structures and durations during a nominal (36 to 48 hours) work week. The proposed changes will allow the use of up to 12 hour shifts without routine heavy use of overtime. The TS will continue to require the controls and guidelines for work hours to be contained in administrative procedures. This will result in fewer operating shift-to-shift turnovers per day and will allow more contiguous days off between work shifts. The net result of longer work shifts will be more rested crews with better communications between shifts.

The proposed changes do not alter the current guidelines on the use of overtime and will not alter the basis for any TS that is related to the establishment of, or maintenance of, a nuclear safety margin. Consequently, operation of St. Lucie Units 1 and 2 in accordance with the proposed amendments will not involve a significant reduction in a margin of safety.

Based on the above, FPL has determined that the proposed amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2)





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Attachment 2  
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create the possibility of a new or different kind of accident from any accident previously evaluated, (3) involve a significant reduction in a margin of safety. Therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.