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50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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RECIP. NAME RECIPIENT AFFILIATION
Records Management Branch (Document Control Desk)

SUBJECT: Forwards proposed section 17.2.1 to St Lucie, Units 1 & 2
UFSAR, revised to accommodate NRC request to incorporate util
commitment for revising quality instructions and/or
administrative procedures described in licensee 980527 ltr.

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September 25, 1998

L-98-247
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), Proposed UFSAR Update

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.

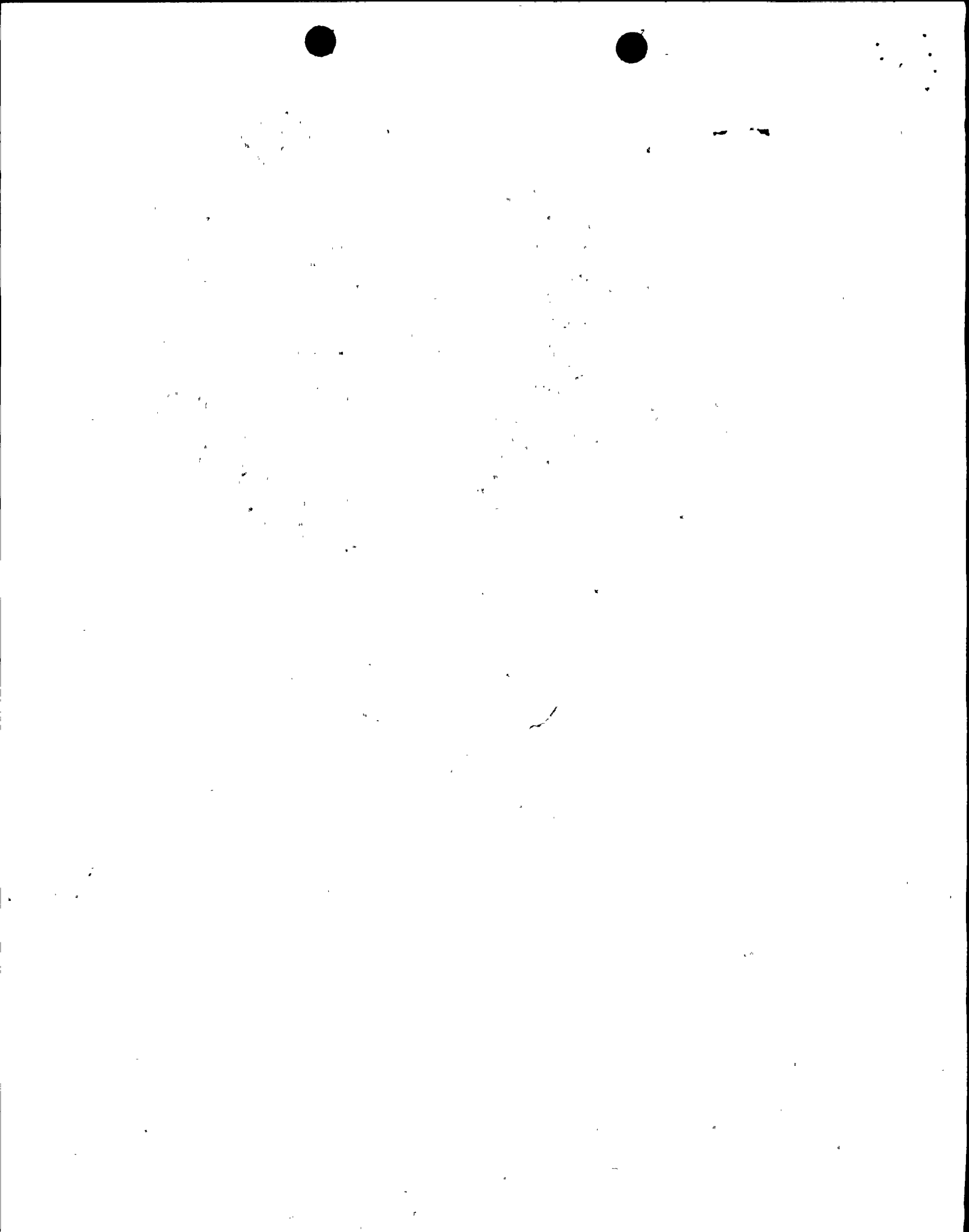
(4) FPL Letter L-98-072, J.A. Stall to NRC (DCD): Proposed License Amendments: Onsite Facility Review Group (TAC Nos. M97209/M97210), Changes to Original Request; May 27, 1998.

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 FPL to revise the proposed TS changes by deleting 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, Reference 3 discussed 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.

Reference 4 is a supplement to Reference 1 and was submitted in response to Reference 3. The supplement addressed the Reference 3 issues and included FPL's commitment to make certain procedural enhancements involving the administrative control process for individuals authorized by the Plant General Manager to approve changes to procedures. Attachment 4 to Reference 4 contains a proposed revision to the Updated Final Safety

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St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
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(TAC Nos. M97209/M97210), Proposed UFSAR Update

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Analysis Report (UFSAR) which describes administrative controls associated with the procedure review process and are conditions of the subject proposed license amendment.

During a telephone conference between W.C. Gleaves (NRC) and E.J. Weinkam (FPL) on September 11, 1998, the NRC staff asked FPL to incorporate its commitment for revising Quality Instructions and/or Administrative Procedures described in Reference 4, Attachment 1, page 5 of 6, into the proposed UFSAR revision. Accordingly, the attachment to this letter is provided to accommodate the staff's most recent request involving this matter.

If the application for license amendment is approved, the revisions proposed for the Quality Assurance chapter of 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). As discussed in Reference 4, the appropriate Quality Instruction(s) and/or Administrative Procedure(s) will be revised during the implementation phase of the approved license amendment.

Please contact us if there are additional 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. Passeti, Florida Department of Health and Rehabilitative Services.

PROPOSED SECTION 17.2.1 to the PSL1/PSL2 UFSAR (revised L-98-072, Attachment 4)

17.2.1 Plant Procedures

The FPL Quality Assurance Manual contains the Topical Quality Assurance Report which complies with the criteria of 10 CFR 50, Appendix B. Generic requirements for Instructions, Procedures and Drawings are provided in section TQR 5.0 of the FPLTQAR, which, in part, requires that instructions and procedures for activities affecting quality shall be prepared, reviewed, and approved in accordance with written Quality Instructions. The Quality Assurance Department reviews and comments on Quality Instructions written by other departments. Comments concerning compliance with corporate Quality Assurance commitments and regulatory requirements are resolved prior to issuance. In addition to the guidance provided in section TQR 5.0 of the FPLTQAR, the following requirements apply to the review process for on-site instructions and plant procedures except Emergency Operating Procedures (EOPs) for which other specific administrative controls have been established.

New procedures and procedure revisions are independently reviewed for technical and functional accuracy by individuals or groups other than the author(s). Quality Instruction(s) and/or Administrative Procedure(s) provide guidance for the conduct of the independent review process. Individuals performing these reviews are knowledgeable in the functional area(s) addressed by each new or revised procedure. Interdisciplinary review(s) is performed when a procedure or procedure revision affects more than one department/functional area. Comments resulting from the independent review process are documented in plant records and are resolved prior to implementation of each new or revised procedure.

New procedures and procedure revisions are reviewed to determine if a 10 CFR 50.59 written safety evaluation or license amendment is required prior to implementation. Quality Instruction(s) and/or Administrative Procedure(s) provide guidance for the conduct of the screening process including criteria the reviewer should consider to determine if a safety evaluation is required. If a safety evaluation or license amendment is not required, the basis for that determination is documented and retained in plant records. Individuals authorized to perform these screening reviews have demonstrated acceptable knowledge of the screening process and are designated in writing as qualified reviewers. Additional review of each procedure revision that requires a written safety evaluation and all new procedures is required pursuant to facility Technical Specification 6.8.

Document control measures for the procedure change process: (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) require 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.

Individuals authorized by the Plant General Manager to approve changes to procedures are responsible for advising the Plant General Manager of any change, prior to its implementation, that has safety significance.

Reference: St. Lucie Unit 1 [2] Facility Operating License Amendment No. (Note).

Note: The appropriate license amendment number to be inserted when the UFSAR revision is processed.