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*Per 10/4/97 w*

SUBJECT: Forwards Rev 33 to "Radiological Emergency Plan." Attachment 1 of ltr provides summary of changes incorporated by rev.

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June 13, 1997

L-97-162  
10 CFR 50.54(q)  
10 CFR 50 Appendix E

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  
Radiological Emergency Plan - Revision 33

In accordance with 10 CFR 50.54(q), enclosed is one copy of the St. Lucie Plant Radiological Emergency Plan revision. Florida Power and Light Company has determined that this revision does not decrease the effectiveness of the plan. In addition, the plan as revised continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E.

Attachment 1 of this letter provides a summary of the changes incorporated by this revision.

Should there be any questions on this revision, please contact us.

Very truly yours,

J. A. Stall  
Vice President  
St. Lucie Plant

JAS/spt

Attachments

cc: Regional Administrator, Region II, USNRC (2 copies)  
Senior Resident Inspector, USNRC, St. Lucie Plant

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St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
L-97-162

## ATTACHMENT 1

## ATTACHMENT 1

### CHANGE DOCUMENT FOR REVISION 33

This document provides a review of the changes incorporated into revision 33 of the St. Lucie Plant Radiological Emergency Plan. This revision of the Plan is not the result of the annual review. The key changes deal with the fire brigade, the Emergency Action Level (EAL) for Reactor Coolant System (RCS) Leakage, and the location of the Operational Support Center.

An explanation/evaluation of the changes is provided. There were no areas of reduced effectiveness identified in this revision.

Note: All page and Section references apply to revision 32.

#### A. Organization, Facilities, and Support Services (2.0)

1. Page 2-4, Figure 2-1, (under "ON-SHIFT" and "PRIMARY") changed "Nuclear Watch Engineer (NWE) Alternate Nuclear Plant Operator (NPO)" to "Fire Brigade Leader"; this change reflects the change in the St. Lucie Plant Fire Protection Program to designate an operator on-shift to serve as the leader of the fire brigade. This person will be qualified to fill this new position of Fire Brigade Leader. This change does not decrease the effectiveness of the Emergency Plan. (see also A.3 below)
2. Page 2-13, Section 2.2.1, description of Nuclear Watch Engineer (NWE), deleted "The NWE is also the Fire Brigade Leader"; this change reflects the fact that the NWE is no longer being used as the primary Fire Brigade Leader in the St. Lucie Plant Fire Protection Program. This change does not decrease the effectiveness of the Emergency Plan.
3. Page 2-14, Section 2.2.1, added new position, "Fire Brigade Leader"; this change reflects the change in the St Lucie Plant Fire Protection Program which replaced the Nuclear Watch Engineer with the Fire Brigade Leader as the leader of the fire brigade. This new position is filled by persons who are qualified to meet the requirements to lead the fire brigade per 10 CFR 50 Appendix R III. H. This change does not decrease the effectiveness of the Emergency Plan because the leader of the fire brigade, while not necessarily a licensed operator, shall be qualified to meet all the requirements of Appendix R to function in the capacity of a fire brigade leader.

A. (continued)

4. Page 2-21, Section 2.2.2. C. 6, Firefighting, changed "The Nuclear Watch Engineer is the Fire Brigade Leader. This position is manned continuously, but if he/she is not available, a Nuclear Plant Operator trained as Fire Brigade Leader may act as an alternate." to "The Fire Brigade is under the direction of the Fire Brigade Leader."; this change reflects the change in the St. Lucie Fire Protection Program to designate an operator on-shift to serve as the leader of the fire brigade. This person will be qualified to fill this new position of Fire Brigade Leader. This change does not decrease the effectiveness of the Emergency Plan. (see also A.3 above)
5. Page 2-33, Section 2.4.3, paragraph four, sentence one, changed "The OSC is maintained in the second floor large conference room in the North Service Building." to "The OSC is maintained in the large conference room on the second floor of the South Service Building".; this change in location of the OSC was proposed in Revision 32 to the Emergency Plan. The move to the new location was completed in February 1997, results in Inspection Report 97-03, P2.2 stated, "the new OSC provided enhanced physical and communications capabilities." This change does not decrease the effectiveness of the Emergency Plan.
6. Page 2-35, Figure 2-6, the figure was revised to show the new location of the OSC. This change does not decrease the effectiveness of the Emergency Plan.

B. Emergency Classification System (3.0)

1. Page 3-5, Table 3-1, UNUSUAL EVENT, number 1.A, changed:

RCS leakage GREATER THAN allowed by Technical Specifications

1. Entry into Technical Specification 3.4.6.2 Action Statement due to:

- a. greater than 1 gpm unidentified leakage.

OR

- b. greater than 10 gpm identified leakage.

OR

2. Inspection reveals any RCS pressure boundary leakage.

B. (continued)

OR

3. Indication of leaking RCS safety or relief valve which causes RCS pressure to drop below 1600 psia.

to:

Reactor Coolant System (RCS) leakage

1. RCS leakage GREATER THAN 10 gpm as indicated by:

- a. Control Room observation

OR

- b. Inventory balance calculation

OR

- c. Field observation

OR

- d. Emergency Coordinator judgement

OR

2. Indication of leaking RCS safety or relief valve which causes RCS pressure to drop below 1600 psia.

This change was submitted to the NRC pursuant to 10 CFR 50.54(q) prior to implementation, per letter dated 17 October, 1996, the NRC concluded that "the proposed EAL meets the requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50 for emergency classification and action level schemes." This change was preapproved by the NRC. NRC approval was contingent on concurrence with the state and local officials. The state and local officials have reviewed and approved this change. Their approval is documented on Enclosure 1 to this Attachment.

C. Response to Accident Conditions (5.0)

1. Page 5-15, Section 5.2.2.2, Evacuation Implementation, paragraph one, last sentence, changed ". . . (North Service Building) . . ." to ". . . (South Service Building) . . ."; this change corrects the location for the OSC. This change does not decrease the effectiveness of the Emergency Plan.

D. Emergency Plan Implementing Procedures (Appendix C)

1. Page (APP-3), deleted EPIP 1108, "Duties of the Nuclear Division Duty Officer"; the instructions from this procedure were incorporated into EPIP 3100023E, "Site Emergency Organization and EPP-15, "Activation and Use of the Emergency Operations Facility." This change does not decrease the effectiveness of the Emergency Plan.
2. Page (APP-3), EPIP 1302 superseded by EPP-17; the procedure was transferred from a corporate procedure to a site procedure, revised to be site specific and upgraded. This change does not decrease the effectiveness of the Emergency Plan.

ENCLOSURE 1 TO ATTACHMENT

FLORIDA POWER AND LIGHT COMPANY  
ST. LUCIE PLANT

EMERGENCY ACTION LEVEL CHANGE

The agencies and/or organizations listed below have been provided an overview of a proposed change in the St. Lucie Plant Emergency Action Levels (EALs). The change revises the declaration threshold for the EAL of an Unusual Event involving reactor coolant system leakage. The undersigned have understood and are in agreement with the proposed change.

Florida Division of Emergency Management:

Title: Director

Signature: Joseph F. Myers

Date 4/25/97

Print Name: JOSEPH F. MYERS

Florida Office of Radiation Control:

Title: ACTING CHIEF

Signature: William A. Passetti

Date 3/17/97

Print Name: WILLIAM A. PASSETTI

St. Lucie County Department of Public Safety:

Title: Public Safety Director

Signature: Jack T. Southard

Date 3-5-97

Print Name: Jack T. Southard

Martin County Department of Emergency Management:

Title: Acting Director

Signature: Edward B. Smith, Jr.

Date 3/5/97

Print Name: Edward B. Smith, Jr.