



January 18, 2002

L-2002-003  
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  
Relocation of Specific Working  
Hour Limits and Controls

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. The proposed amendments would relocate specific working hour limits and controls contained in the TS to administrative procedures. Site personnel working hours currently are, and will continue to be, controlled by administrative procedures. The proposed changes are based on Technical Specification Task Force (TSTF) - 258, Revision 4.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain copies of the affected Technical Specifications pages marked up to show the proposed changes.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed amendments. In accordance with 10 CFR 50.91(b)(1), copies of the proposed amendments are being forwarded to the State Designee for the State of Florida.

There is no specifically required approval date. Please issue the amendments to be effective on the date of issuance and to be implemented within 60 days of receipt by FPL.

A001

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Please contact us if there are any questions about this submittal.

Very truly yours,



Donald E. Jernigan  
Vice President  
St. Lucie Plant

DEJ/KWF

Attachments

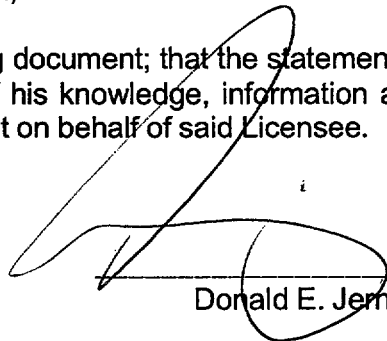
cc: Mr. W. A. Passetti, Florida Department of Health

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

Donald E. Jernigan, being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power and 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.

  
\_\_\_\_\_  
Donald E. Jernigan

STATE OF FLORIDA

COUNTY OF ST. LUCIE

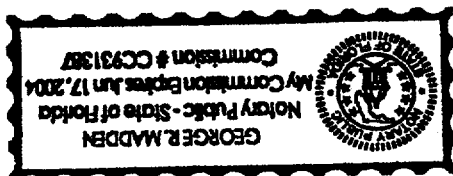
Sworn to and subscribed before me

this 18 day of January, 2002

by Donald E. Jernigan, who is personally known to me.

  
Signature of Notary Public State of Florida

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



St. Lucie Units 1 and 2  
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Attachment 1  
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## EVALUATION OF PROPOSED TS CHANGES

## EVALUATION OF PROPOSED TS CHANGES

### Introduction

Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. The proposed amendments would remove the numerical working hour limits stated in the TS. Site personnel working hours currently are and will continue to be controlled by administrative procedures. The proposed changes are based on TSTF-258, Revision 4.

The industry and the Nuclear Regulatory Commission (NRC) staff have been working through the Technical Specifications Task Force (TSTF) to develop generic changes for Standard Technical Specifications, known as TSTFs. The TSTFs, once approved by the NRC, can be used as models by licensees in amendment requests. The proposed TS changes are based on the TSTF process. The proposed changes conform closely to TSTF-258, Revision 4 of the industry TSTF. TSTF-258, Revision 4 revises several administrative controls, including changes to the TS administrative controls governing site personnel working hours. TSTF-258, Revision 4 was approved by the NRC staff in a letter dated June 29, 1999.

### Evaluation

FPL proposes that the requirement for administrative controls on working hours of plant staff, currently included in Section 6.2.2.f of the TS, be replaced with a general requirement for a procedure to establish and maintain working hour limits. The four specific guidelines on working hours currently specified in Section 6.2.2.f are not required by 10 CFR 50.36(c)(5). These guidelines are already implemented by FPL plant procedures and can be removed from the TS.

On February 18, 1982, the NRC published the "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" (47 FR 23836). In June 1982, the NRC revised the policy and subsequently disseminated the revision in Generic Letter (GL) 82-12, "Nuclear Power Plant Staff Working Hours," which recommended that licensees incorporate specific working hour limits in the TS to manage the potential for personnel errors resulting from fatigue. The NRC subsequently determined that very few events at U.S. nuclear plants have been attributed to inadequate control of working hours, and that licensees can adequately control working hours with administrative procedures. This approach is consistent with Action Item I.A.1.3.1, "Limit Overtime," of NUREG-0737, "Clarification of TMI Action Plan Requirements," and with the changes endorsed by TSTF-258, Rev. 4.

TSTF-258, Rev. 4 endorsed revisions to TS Section 6.2.2.f that relocate specific working hour limits to administrative procedures that control working hours. As justified in TSTF-258, Rev. 4, the proposed changes provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation. Specific working hour limits are not otherwise required to be in the technical specifications under 10 CFR 50.36(c)(5). Specific controls for working hours of reactor plant staff are described in procedures that require a deliberate decision-making process to control the potential for impaired personnel performance. Additionally, established procedure control processes will provide sufficient control for changes to the administrative procedures. These changes are consistent with the recommendations in the April 9, 1997 letter from C. Grimes to J. Davis. The statement that individual overtime shall be reviewed monthly by the Plant Superintendent or his designee to ensure that excessive hours have not been assigned is being changed to require a periodic independent review. As used in this application, the term independent is to only ensure the review is performed by individual(s) different than the individual(s) actually authorizing the overtime. Additionally, the term periodic shall be based on plant experience, outage frequencies, and other management review practices (i.e., more frequent reviews conducted during shutdown/refueling when a lot of overtime can be expected, versus less frequent reviews at rated thermal power with little anticipated overtime).

The underlying intent of the current administrative controls on plant staff working hours is to ensure that personnel performing safety related functions are fit to carry out these duties and responsibilities. The performance based objective is in effect to manage the potential for errors caused by fatigue and in particular, to prevent such errors from being introduced into operations and maintenance activities. FPL fully supports and is committed to this objective. Existing FPL administrative procedures contain specific controls for working hours of plant staff and require a deliberate decision-making process to control the potential for impaired personnel performance. FPL's established procedure control processes provide sufficient control for any future changes to that procedure.

### **TS Change Description**

TS page mark ups for the proposed changes are in Attachments 3 (Unit 1) and 4 (Unit 2). The St. Lucie Units 1 and 2 TSs do not conform with the Standard Technical Specifications (STS) format. The only administrative difference between the wording and format FPL proposes and the exact wording and format for the TS changes approved by TSTF-258 is that the TSTF describes changes to Section 5.2.2.e of the Standard Technical Specifications (STS), where the equivalent St. Lucie TS reside in Section 6.2.2.f. The proposed changes conform with the TSTF wording and are highlighted by strike-through and italics as shown below.

6.2.2.f.

Administrative procedures shall be developed and implemented to limit the working hours of ~~unit staff~~ **personnel** who perform safety-related functions; (e.g., **licensed** senior reactor operators (**SROs**), **licensed** reactor operators (**ROs**), health physicists, auxiliary operators, and key maintenance personnel). The administrative procedures shall include guidelines on working hours that ensure that adequate shift coverage ~~is~~ **shall be** maintained without routine heavy use of overtime ~~for individuals. 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 General Manager or ~~his deputy the Plant General Manager's designee, or higher levels of management,~~ in accordance with ~~established~~ **approved administrative** 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 General Manager or his designee to assure to require a periodic independent review be conducted to ensure~~ that excessive hours have not been assigned. Routine deviation from the ~~above working hour~~ guidelines ~~is not shall not be~~ authorized.

## Conclusion

As discussed above, these proposed TS changes are based on TSTF-258, Rev. 4. Working hour limits on site personnel are not required to be governed by the TS in accordance with 10 CFR 50.36(c)(5). Existing FPL administrative procedures contain specific controls for working hours of plant staff and require a deliberate decision-making process to control the potential for impaired personnel performance. FPL's established procedure control processes provide sufficient control for any future changes to that procedure. Therefore, the changes are acceptable.

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Attachment 2  
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## DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION



## DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

**Description of amendment request:** The proposed license amendments (PLAs) to Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 relate to the relocation of TS specific working hour limits and controls to administrative procedures that control working hours. The proposed changes conform closely to the industry and NRC approved TSTF-258 Rev. 4.

Pursuant to 10 CFR 50.92, a determination may be made that a proposed license amendment 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; (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 as follows.

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

The proposed amendments are administrative in nature and they do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. These proposed changes do not change the existing administrative controls on plant staff working hours. Any future changes to these procedures will be controlled under established procedure control processes that will ensure the administrative controls on work hours remain effective. Further, the proposed changes do not alter the design, function, or operation of any plant component. Therefore, 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.

**(2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The changes being proposed are administrative in nature and do not introduce a new mode of plant operation or surveillance requirement, nor involve a physical modification to the plant. Therefore, the design, function, or operation of any plant component is not altered. The changes propose to relocate specific controls for plant staff working hours from the TS to existing administrative procedures. The specific controls for plant staff working hours are described in these procedures and require a deliberate decision-making process to manage the potential for impaired personnel performance. Therefore, 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.

**(3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.**

The proposed changes conform closely to the industry and NRC approved TSTF-258 Rev. 4 and relate to the relocation of TS specific working hour limits and controls to administrative procedures that control working hours. The specific controls for working hours of reactor plant staff are described in procedures that require a deliberate decision-making process to manage the potential for impaired personnel performance. Furthermore, any future changes to these procedures will be controlled under established procedure control processes that will ensure the administrative controls on work hours remain effective. Therefore, operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

Based on the above discussion and the supporting evaluation of Technical Specification changes, FPL has determined that the proposed license amendments involve no significant hazards consideration.

### **Environmental Consideration**

FPL has reviewed the proposed Technical Specification changes against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. FPL concludes that the proposed Technical Specifications changes meet the criteria set forth in 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an environmental impact statement or environmental assessment, as this request proposes changes to recordkeeping, reporting, or administrative procedures or requirements. Therefore, pursuant to 10 CFR 51.22(b) an environmental impact statement or an environmental assessment is not required.

### **Conclusion**

FPL concludes, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

ST. LUCIE UNIT 1 MARKED UP TECHNICAL SPECIFICATION PAGES

## 6.0 ADMINISTRATIVE CONTROLS

- 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.

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AND  
REPLACE  
WITH  
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The administrative procedures shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals. 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 General 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 General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- g. The Operations Supervisor shall hold a Senior Reactor Operator license.

### SHIFT TECHNICAL ADVISOR

- 6.2.3 The Shift Technical Advisor function is to provide on shift advisory technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

INSERT

Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed senior reactor operators (SROs), licensed reactor operators (ROs), 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 maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or the Plant General Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

ST. LUCIE UNIT 2 MARKED UP TECHNICAL SPECIFICATION PAGES

Page 6-2  
Page 6-2a

## 6.0 ADMINISTRATIVE CONTROLS

### 6.2 ORGANIZATION (Continued)

#### UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator shall be in the control room.
- c. A health physics technician\* shall be on site when fuel is in the reactor.
- d. Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.
- e. DELETED

- 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 is maintained without routine heavy use of overtime for individuals. 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:

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WITH INSERT

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# The health physics technician may be less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

INSERT

Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed senior reactor operators (SROs), licensed reactor operators (ROs), 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 maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or the Plant General Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.



**6.0 ADMINISTRATIVE CONTROLS**

**UNIT STAFF** (Continued)

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- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. 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.
- c. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
- d. 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 General 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 General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- g. The Operations Supervisor shall hold a Senior Reactor Operator License.

Move g. to Page 6-2 and delete

TS page ~~6-2a~~. 6-2a