

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Plant Manager - Nuclear shall be responsible for overall licensed facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

- 6.2.1 The offsite organization for facility management and technical support shall be as shown in Appendix A of the Florida Power and Light Company Topical Quality Assurance Report.

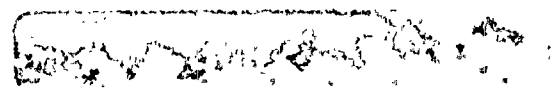
FACILITY STAFF

- 6.2.2 The Facility organization shall be as shown on Figure 6.2-1 and:

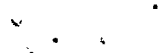
- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.

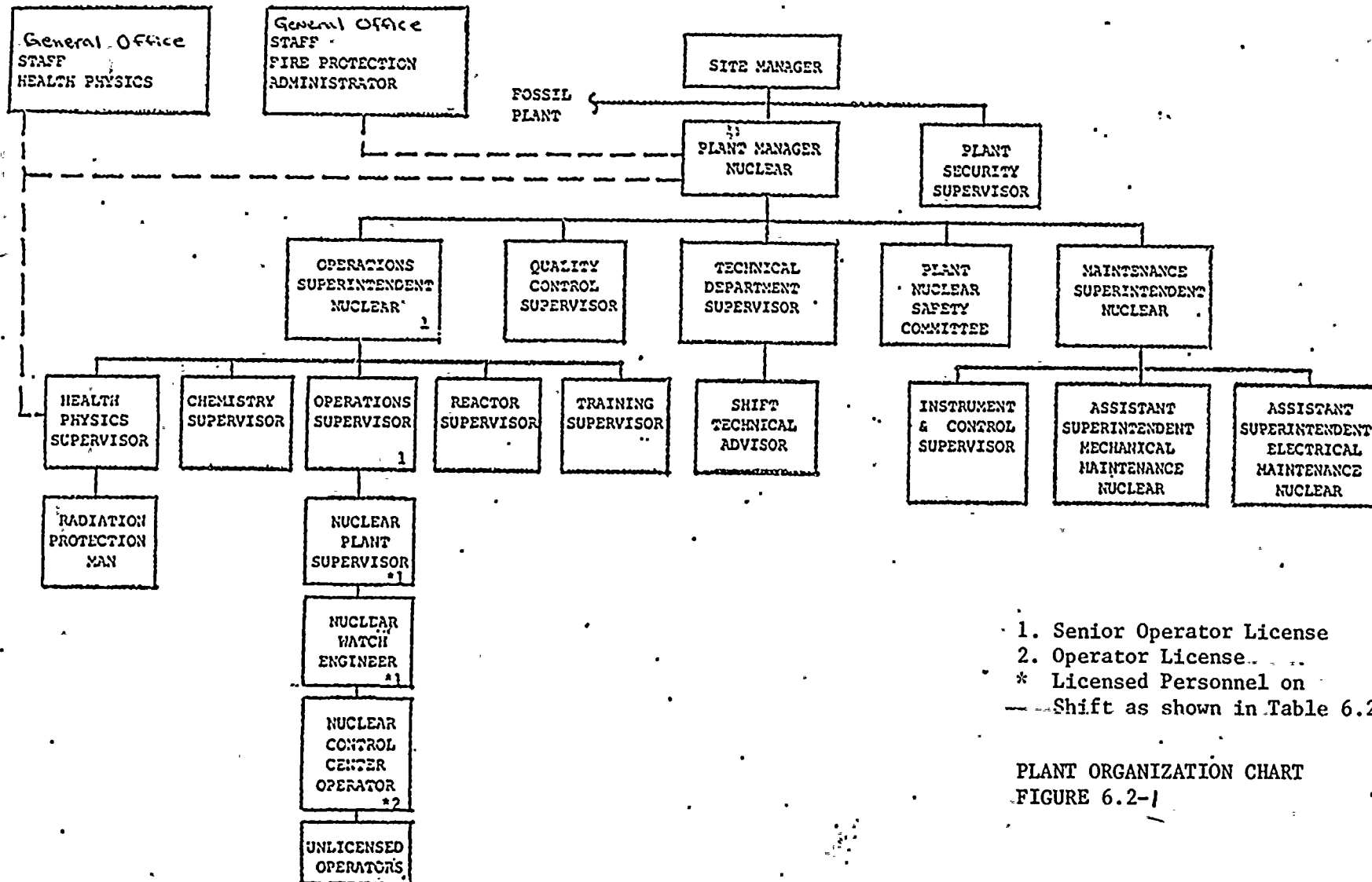
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between the PNSC and the Plant Manager - Nuclear; however, the Plant Manager - Nuclear shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

6.5.1.8 RECORDS

The Plant Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to the head of the Nuclear Energy Department and Chairman of the Company Review Board.

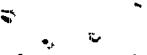
6.5.2. COMPANY NUCLEAR REVIEW BOARD (CNRB).

6.5.2.1 The Company Nuclear Review shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations.
- b. Nuclear engineering.
- c. Chemistry and radiochemistry.
- d. Metallurgy.
- e. Instrumentation and control.
- f. Radiological safety.
- g. Mechanical and electrical engineering.
- h. Quality assurance practices.

6.5.2.2 COMPOSITION

The composition of the CNRB shall be as shown in Appendix A of Florida Power & Light Company Topical Quality Assurance Report.



6.5.2.3 ALTERNATES

Alternate members shall be appointed in writing by the (CNRB) Chairman to serve on a temporary basis; however, no more than two alternates shall participate in (CNRB) activities at any one time.

6.5.2.4 CONSULTANTS

Consultants shall be utilized as determined by the CNRB to provide expert advice to the CNRB.

6.5.2.5 MEETING FREQUENCY

The CNRB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

6.5.2.6 QUORUM

A quorum of the CNRB shall consist of the chairman or designated acting Chairman and four (4) members including alternates. No more

SAFETY EVALUATION

There are no safety related effects connected with the removal of the offsite management and technical support description and organization charts from the Technical Specifications. The purpose of including these descriptions is for general information and the corporate structure to those in possession of the Technical Specifications. However, this same information is also contained in the Florida Power & Light Company Topical Quality Assurance report (FPLTQAR).

We supply controlled copies of the FPLTQAR to at least the same non-FPL organizations as receive controlled copies of the Technical Specifications. The FPLTQAR is required to be updated to reflect all changes to the organization which affect quality within 30 days by letter and one year by amendment. It is our opinion that duplication of material between the two documents is unnecessary and that processing the same change twice is an unneeded burden on the time and manpower resources of both FPL and the NRC. Should the need arise for information on the organization, the FPLTQAR will be available to the same people who previously would have had the organizational description in the Technical Specifications.

In a similar fashion the composition of the CNRB is duplicated in both the Technical Specifications and FPLTQAR. For the same reasons as stated above, we propose to remove the specific composition of the CNRB from the Technical Specifications.



6.0 ADMINISTRATIVE CONTROLS

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6.1 RESPONSIBILITY

- 6.1.1 The Plant Manager - Nuclear shall be responsible for overall licensed facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 OFFSITE

The offsite organization for facility management and technical support shall be shown on Figure 6.2-1.

6.2.2 FACILITY STAFF

The Facility organization shall be as shown on Figure 6.2-2 and:

- 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 Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.

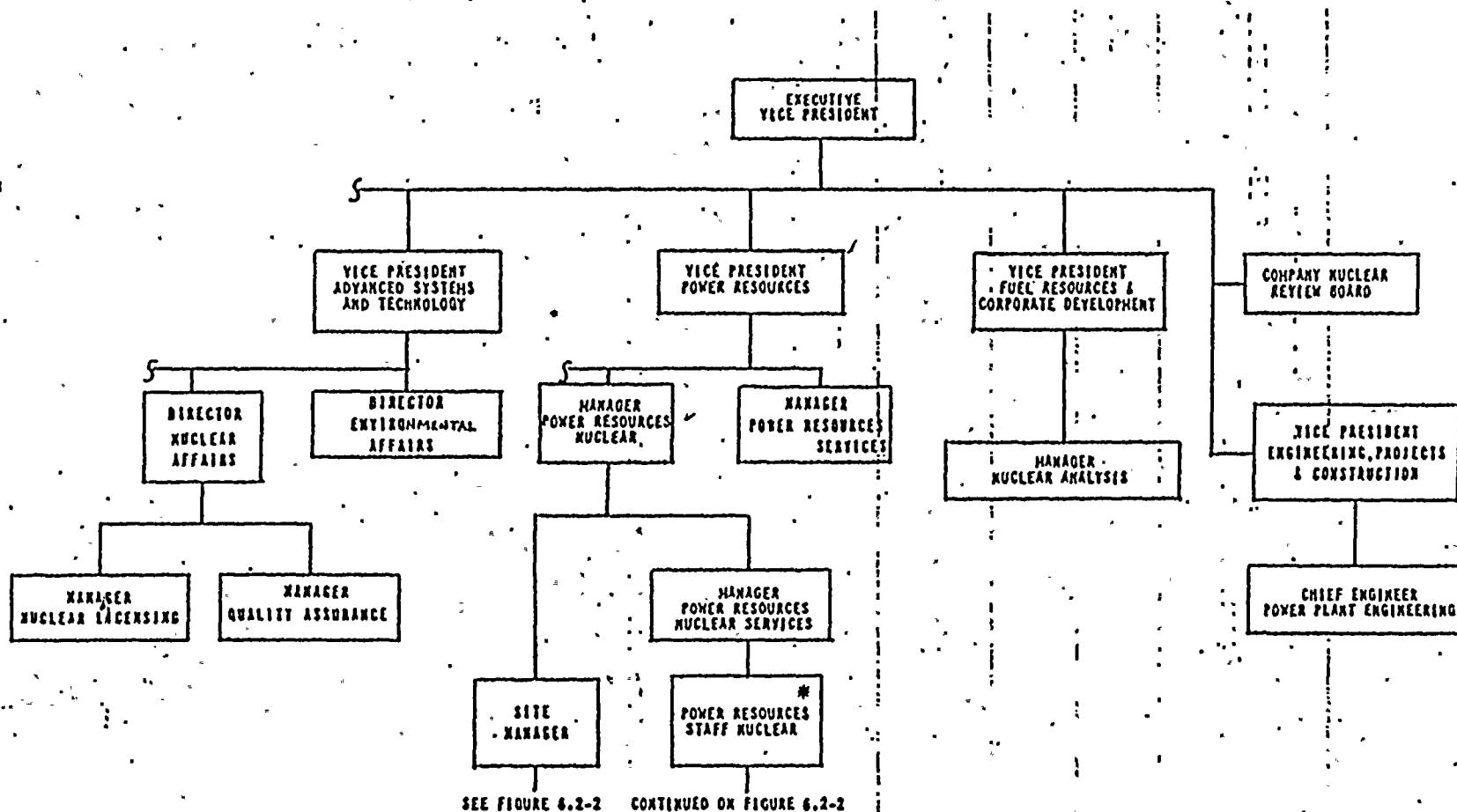


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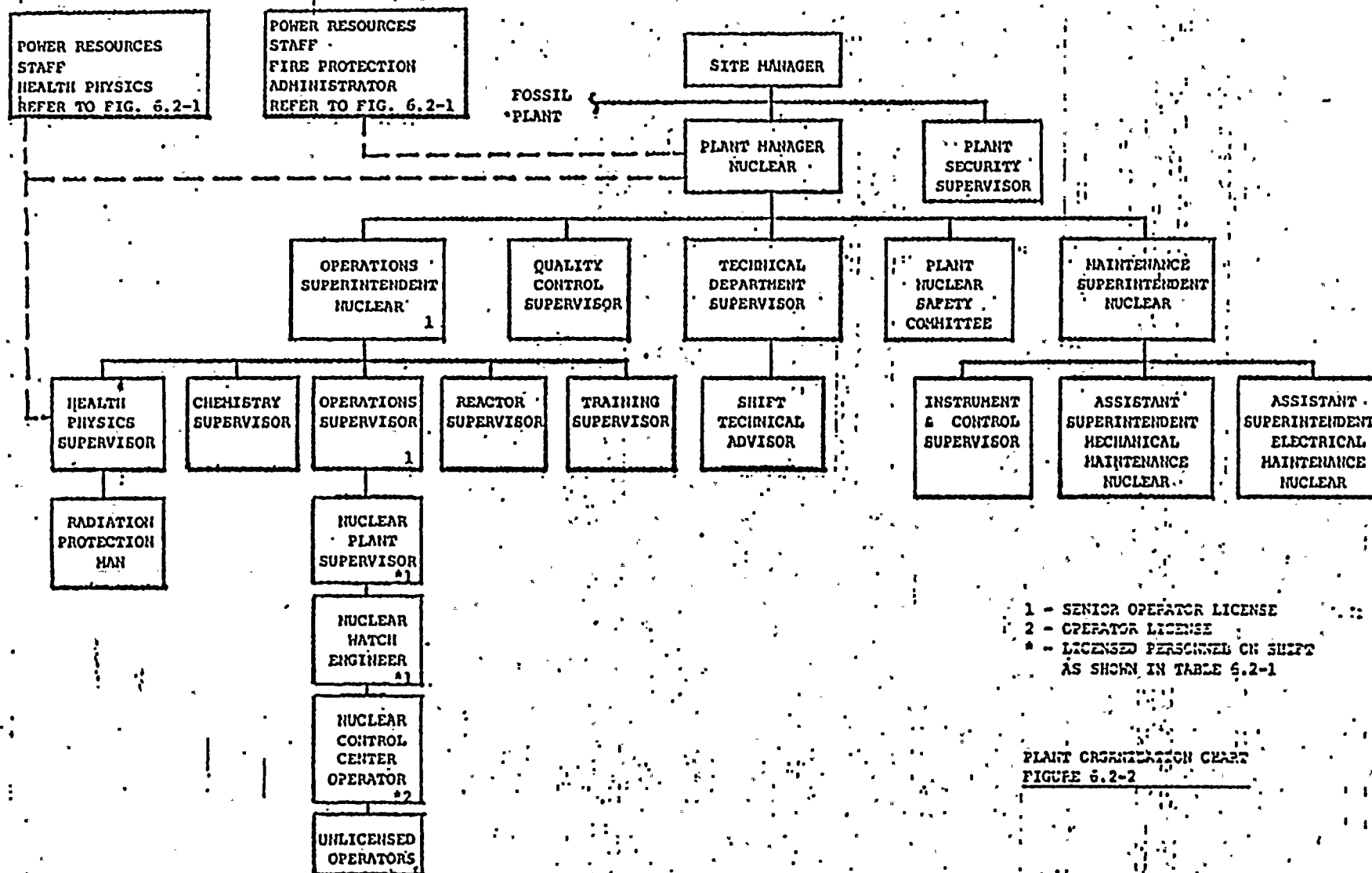
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* INCLUDES HEALTH PHYSICS, RADIOCHEMISTRY, PLANT SUPPORT, FIRE PROTECTION ADMINISTRATOR, EMERGENCY PLANNING, ETC.

FIGURE 6.2-1 OFFSITE ORGANIZATION FOR FACILITY MANAGEMENT AND TECHNICAL SUPPORT





1 - SENIOR OPERATOR LICENSE
2 - OPERATOR LICENSE
* - LICENSED PERSONNEL ON SHIFT
AS SHOWN IN TABLE 6.2-1

PLANT ORGANIZATION CHART
FIGURE 6.2-2



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TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION#

| LICENSE CATEGORY QUALIFICATIONS | One or Two Units Operating ^A | All Units Shutdown |
|--------------------------------------|--|--------------------|
| SRO* | 2 | 1** |
| RO | 3 | 2 |
| Non-Licensed Auxiliary Operators. | 3 | 3 |
| Shift Technical Advisor | 1 ⁺ | None Required |

* This position may be filled by one of the SRO's above, provided the individual meets the qualification requirements of 6.3.1

* Includes the licensed Senior Reactor Operator serving as Shift Supervisor.

** Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising the movement of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel.

A Operating is defined as $K_{eff} \geq 0.99$; % thermal power excluding decay heat greater than or equal to zero, and an average coolant temperature $T_{avg} \geq 200^{\circ}\text{F}$.

Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.



- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. At least three (3) persons shall be maintained on site at all times for Fire Emergency response. This excludes two (2) members of the shift crew.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

6.3.2 HEALTH PHYSICS SUPERVISOR QUALIFICATIONS

6.3.2.1. The Health Physics Supervisor at the time of appointment to the position, shall, except as indicated below, meet the following:

- 1. He shall have a bachelor's degree or equivalent in a science or engineering subject, including some formal training in radiation protection.
- 2. He shall have five years of professional experience in applied radiation protection; where a master's degree in a related field is equivalent to one year experience and a doctor's degree in a related field is equivalent to two years of experience.
- 3. Of his five years of experience, three years shall be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered at Turkey Point Plant.

6.3.2.2. When the Health Physics Supervisor does not meet the above requirements, compensatory action shall be taken which the Plant Nuclear Safety Committee determines, and the NRC Office of Nuclear Reactor Regulation concurs that the action meets the intent of Specification 6.3.2.1.

6.4 TRAINING

6.4.1 A retaining and replacement program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5, ANSI N18.1-1971 and Appendix A to 10 CFR Part 55.



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6.4.2 A training program for the Fire Emergency response members shall be maintained under the direction of the Fire Protection Administrator and should meet or exceed the requirements of Section 27 of the NFPA Code-1975, except for fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 Plant Nuclear Safety Committee (PNSC)

6.5.1.1 FUNCTION

The PNSC shall function to advise the Plant Manager-Nuclear on all matters related to nuclear safety.

6.5.1.2 COMPOSITION

The Plant-Nuclear Safety Committee shall be composed of the:

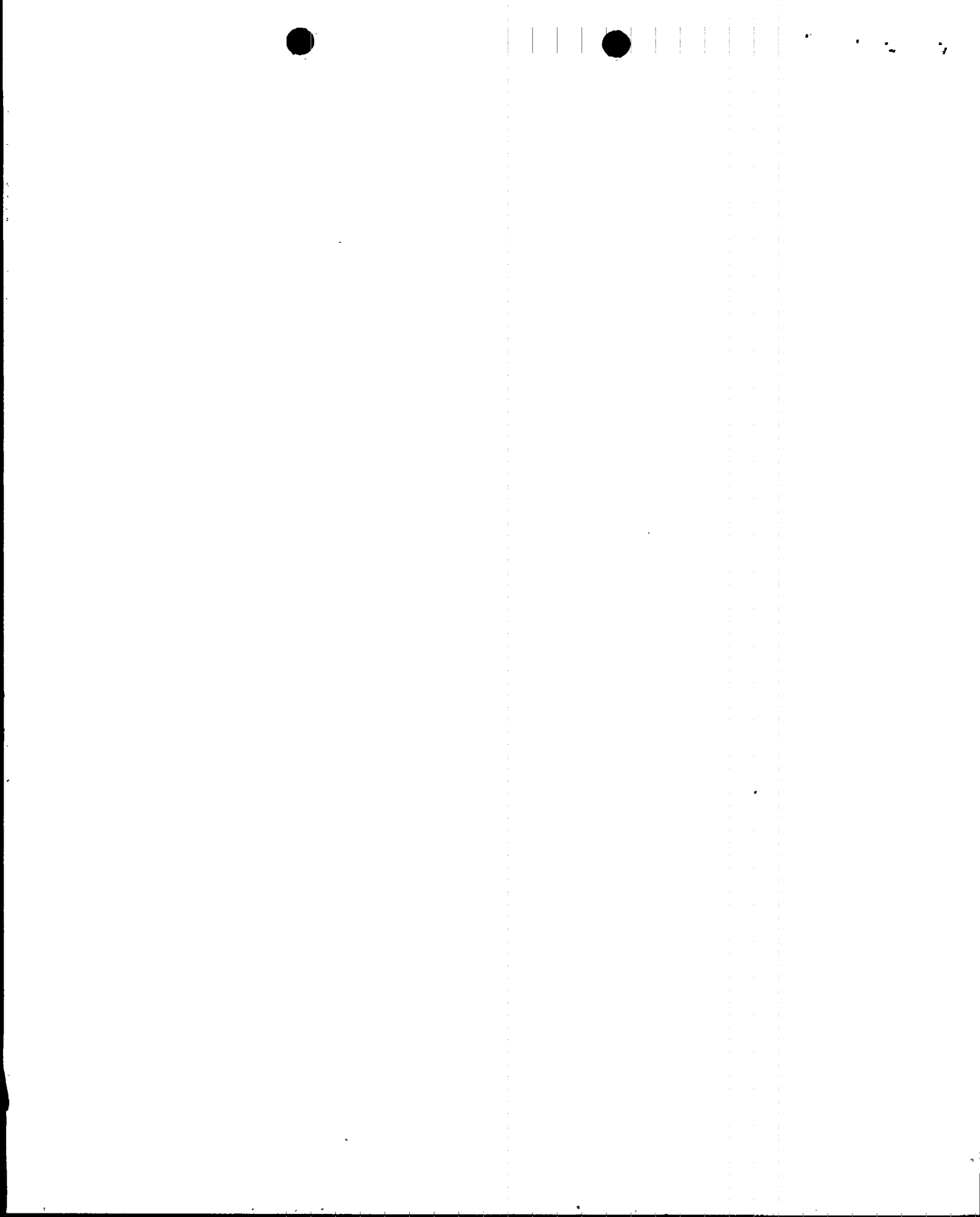
1. Chairman: Plant Manager - Nuclear
2. Vice Chairman: Operations Superintendent - Nuclear
3. Technical Department Supervisor
4. Maintenance Superintendent - Nuclear
5. Instrument and Control Supervisor
6. Health Physics Supervisor
7. Reactor Supervisor

6.5.1.3 ALTERNATES

Alternate members shall be appointed in writing by the PNSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PNSC activities at any one time.

6.5.1.4 MEETING FREQUENCY

The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman.



6.5.1.5 QUORUM

A quorum of the PNSC shall consist of the Chairman or Vice Chairman and four (4) members including alternates.

6.5.1.6 RESPONSIBILITIES

The Plant Nuclear Safety Committee shall be responsible for:

a. Review of 1) all procedures and changes thereto required by Section 6.8 and 2) any other proposed procedures or changes thereto as determined by the Plant Manager; Nuclear to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to the Technical Specifications in Appendix A of the license.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications and preparation and forwarding a report covering evaluation and recommendations to prevent recurrence to the Manager of Power Resources - Nuclear, to the Vice President of Power Resources and to the Chairman of the Company Nuclear Review Board.



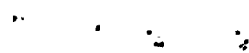
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- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Company Nuclear Review Board.
- h. Review of the Plant Security Plan and implementing procedures and submitting recommended changes to the Chairman of the Company Nuclear Review Board.
- i. Review of the Emergency Plan and implementing procedures and submitting recommended changes to the Chairman of the Company Nuclear Review Board.

6.5.1.7 AUTHORITY

The Plant Nuclear Safety Committee shall:

- a. Recommend to the Plant Manager - Nuclear written approval or disapproval (in minutes of PNSC meeting) of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing (in minutes of PNSC meetings) with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the Vice President - Power Resources and the Company Nuclear Review Board of disagreement.



between the FNSC and the Plant Manager - Nuclear; however, the Plant Manager - Nuclear shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

6.5.1.8 RECORDS

The Plant Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President - Power Resources and Chairman of the Company Review Board.

6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)

6.5.2.1 FUNCTION

The Company Nuclear Review Board shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations.
- b. Nuclear engineering.
- c. Chemistry and radiochemistry.
- d. Metallurgy.
- e. Instrumentation and control.
- f. Radiological safety.
- g. Mechanical and electrical engineering.
- h. Quality assurance practices.

6.5.2.2 COMPOSITION

The CNRB shall be composed of the:



1. Chairman: Vice President - Advanced Systems and Technology
2. Member: Chief Engineer - Power Plant Engineering
3. Member: Vice President - Power Resources
4. Member: Manager of Power Resources - Nuclear
5. Member: Director of Nuclear Affairs
6. Member: Power Plant Engineering Manager
7. Member: Power Plant Engineering supervisor

6.5.2.3

ALTERNATES

Alternate members shall be appointed in writing by the (CNRB) Chairman to serve on a temporary basis; however, no more than two alternates shall participate in (CNRB) activities at any one time.

6.5.2.4

CONSULTANTS

Consultants shall be utilized as determined by the CNRB to provide expert advice to the CNRB.

6.5.2.5

MEETING FREQUENCY

The CNRB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

6.5.2.6

QUORUM

A quorum of the CNRB shall consist of the Chairman or designated acting Chairman and four (4) members including alternates. No more

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that a minority of the quorum shall have the responsibility for operation of the facility.

6.5.2.7

REVIEW

The CNRB shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and, 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or Licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All events which are required by regulations or Technical Specifications to be reported to the NRC in writing within 24 hours.

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- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.

- i. Reports and meeting minutes of the Plant Nuclear Safety Committee.

6.5.2.8 AUDITS

Audits of facility activities shall be performed under the cognizance of the CNRB. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the entire facility staff at least once per year.
- c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.
- e. The Emergency Plans and implementing procedures at least once per two years.
- f. The Security Plan and implementing procedures at least once per two years.
- g. The Facility Fire Protection Program and implementing procedures at least once per two years.



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- h. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than three (3) years.
- j. Any other area of facility operation considered appropriate by the CNRB or the Executive Vice President.

6.5.2.9 AUTHORITY

The CNRB shall report to and advise the Executive Vice President on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

6.5.2.10 RECORDS

Records of CNRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each CNRB meeting shall be prepared, approved and forwarded to the Executive Vice President within fourteen days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7.e, f, g and h above, shall be prepared, approved and forwarded to the Executive Vice President within fourteen days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President and to the management positions responsible for the areas audited within thirty (30) days after completion of the audit.



6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken in the event a REPORTABLE OCCURRENCE:

- a. The REPORTABLE OCCURRENCE shall be reported to the Commission pursuant to the requirements of Section 6.9.
- b. A Reportable Occurrence Report shall be prepared. The report shall be reviewed by the Plant Nuclear Safety Committee.
- c. The Reportable Occurrence Report shall be submitted to the CNRB, the Vice President of Power Resources, and the Commission within the time allotted in Section 6.9.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported immediately to the Commission, the Vice President of Power Resources and to the CNRB.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNISC. This report shall describe:
 - 1) applicable circumstances preceding the violation,
 - 2) effects of the violation upon facility components, systems or structures, and
 - 3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the CNRB, the Vice President of Power Resources and the Commission within ten (10) days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972, Appendix "A" of USNRC Regulatory Guide 1.33, and the Facility Fire Protection Program except as provided in 6.8.2 and 6.8.3 below. This requirement shall be implemented within four (4) months from the effective date of this amendment.



6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PNSC and approved by the Plant Manager - Nuclear prior to implementation and periodically as provided by procedure.

6.8.3. Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operators License on the unit affected.
- c. The change is documented, reviewed by the PNSC and approved by the Plant Manager - Nuclear within fourteen days of implementation

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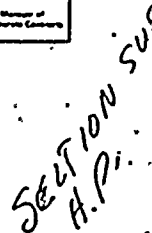
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