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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME AUTHOR AFFILIATION  
 UHRIG, R.E. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 EISENHUT, D.G. Division of Licensing

SUBJECT: Advises that util review of current nuclear plant staff working hours indicates that overtime restrictions meet intent of revised NRC policy. Requirements incorporated in administrative procedures & need not be added to Tech Specs.

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 TITLE: OR Submittal: TMI Action Plan Rgmt NUREG-0737 & NUREG-0660

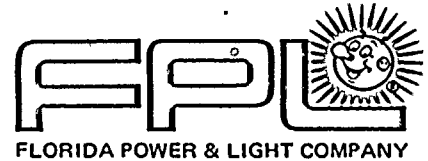
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October 12, 1982  
L-82-436

Office of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Generic Letter 82-12  
Nuclear Power Plant Staff Working Hours

Your Generic Letter 82-12, Nuclear Power Plant Staff Working Hours, transmitted your revised policy on overtime and requested that FPL review our past actions to assure that they are consistent with it. This Generic Letter was the latest in a series of clarifications on the subject of overtime restrictions that began in February 1, 1980 with I&E Bulletin 80-02.

We have reviewed our current status regarding overtime restrictions and conclude that they meet the spirit and intent of your policy statement. The current policy is the same which was in place and was reviewed against NUREG-0737 and found acceptable by Steven Varga in his October 20, 1981 letter. While there are several differences between NUREG-0737 and 82-12, the major difference appears to be the request to amend the administrative section of the Technical Specifications to assure the procedures and documentation required are followed. It is our position that these requirements are adequately enforced by incorporation in the Administrative Procedures and amending the Technical Specifications is unnecessary at this time.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/JEM/cab

cc: Mr. James P. O'Reilly, Region II  
Harold F. Reis, Esquire

*AAAL*

