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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
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Advises that CNRB member qualifications in conformance w/Reg
 Guide 1.33 guidance & applicable to ANSI N18.7. Proposed Tech
 Spec amend updating offsite organization should be approved
 w/o NRC requested qualification paragraph.

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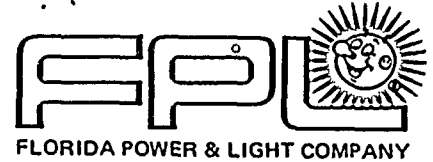
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02000520 Turkey Power Plant, Unit 2, Florida Power and Light Co
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02000521 Turkey Power Plant, Unit 4, Florida Power and Light Co

1. The requested qualification paragraph.
2. Once among updating office organization should be approved
3. Under 1.33 guidance & applicable to ANSI A18.7. Proposed Tech
4. Advised that limit number qualifications in conformance with

1. Title: General Distribution
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December 30, 1982
L-82-563

Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

8301040321 821230
PDR ADOCK 05000250
PDR

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Offsite Organization Technical Specification

Your letter dated November 16, 1982, contained a safety evaluation of our proposed Technical Specification change updating our Offsite Organization. This SER concluded that without a statement setting down qualification requirements for CNRB members, you could not determine if the members of the CNRB met your minimum requirements. However, a qualification statement such as you suggest has not been required for a recently approved similar Technical Specification amendment for St. Lucie 1, is not included in the draft Technical Specification for St. Lucie 2, nor is it contained in the Standard Technical Specifications, Revision 3. For these reasons, the inclusion of such a statement does not seem appropriate.

It should be noted that the membership of the FPL CNRB has recently been reviewed and approved by the NRC as part of the St. Lucie Unit 2 Operating License review. The CNRB is a company-wide board whose responsibility includes all units. Therefore, the qualifications of the members of the CNRB has already been judged to be in conformance with staff guidance described in Regulatory Guide 1.33 and applicable industry standards (ANSI N18.7) in the St. Lucie Unit 2 Safety Evaluation Report, dated October 1981.

In view of the above, it is our position that the proposed amendment should be approved as submitted, without the requested qualification paragraph.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

A001

REU/JEM/cab

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

