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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising
 Tech Specs by deleting Figure 6.2-1 & 6.2-2 of Section 6,
 Administrative Controls & replacing w/more general
 organizational requirements. Fee paid

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THE SECRETARY OF THE ARMY
 WASHINGTON, D. C.
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FEBRUARY 19 1988

L-88-85

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Dockets 50-250 and 50-251
Proposed License Amendment
Administrative Controls

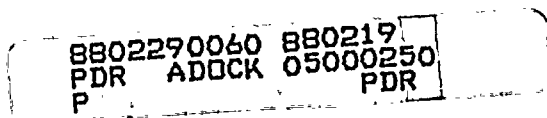
In accordance with 10 CFR 50.90, Florida Power & Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41, Turkey Point Units 3 and 4 Technical Specifications, be amended to revise Section 6, Administrative Controls, by deleting Figure 6.2-1 and 6.2-2 and replacing them with more general organizational requirements, to reflect recent and proposed organization changes affecting the onsite and offsite organization, to revise the designation of the Chairman of the Company Nuclear Review Board, and to revise reporting requirements with respect to the Plant Nuclear Safety Committee.

It has been determined that the proposed amendment does not involve a significant hazards consideration pursuant to 10 CFR 50.92. A description of the amendment request and the basis for a no significant hazards consideration determination is provided in Attachment 1. The proposed revised technical specification changes are shown on the pages included in Attachment 2.

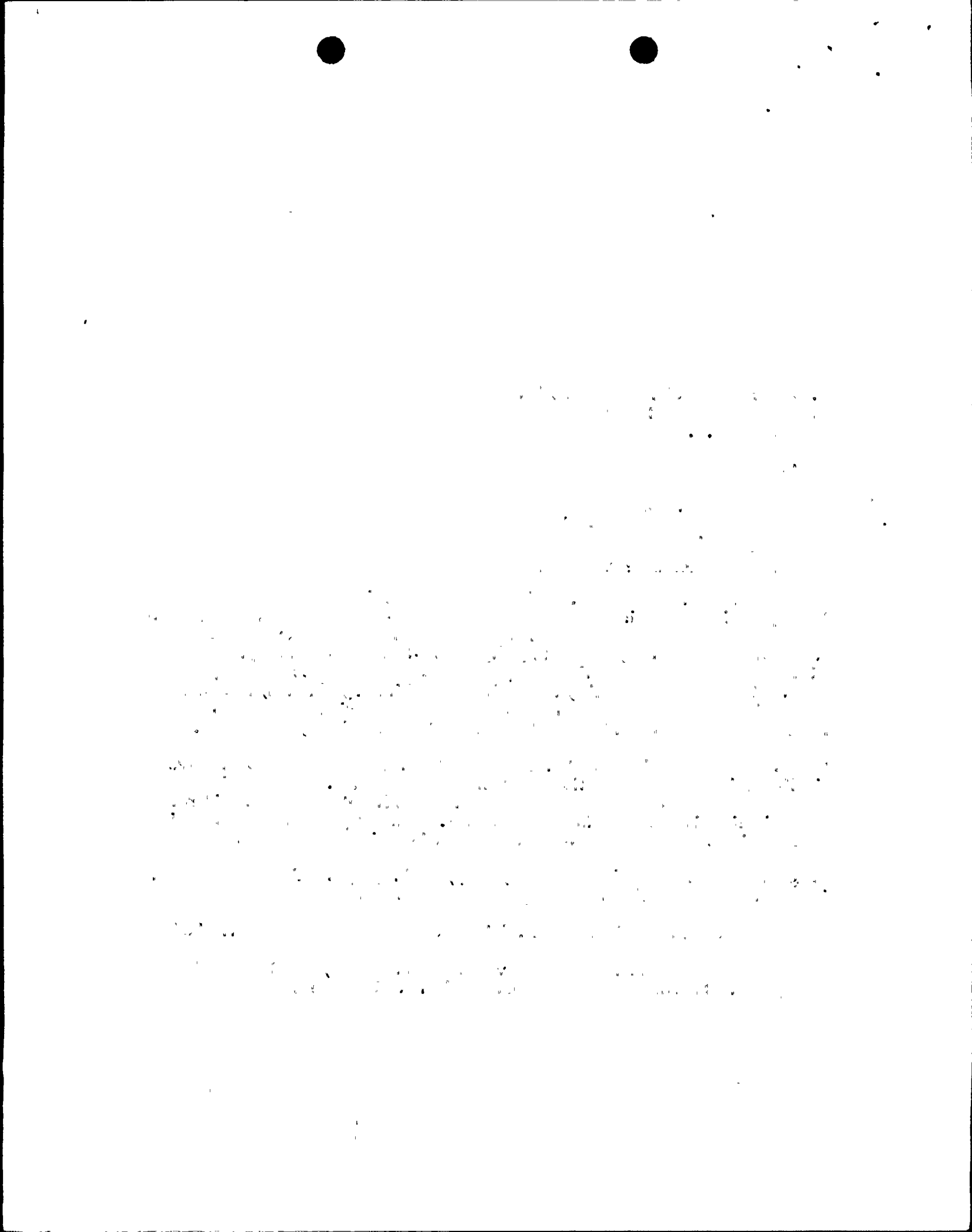
In accordance with 10 CFR 50.91(b)(1), a copy of this proposed license amendment is being forwarded to the State Designee for the State of Florida.

In accordance with 10 CFR 170.12(c), FPL Check No. 7393 for \$150 is attached.

The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.



Handwritten notes:
Aool
w/ check
\$ 150
7393



U. S. Nuclear Regulatory Commission
L-88-85
Page two

We request your approval of this proposed amendment as soon as possible, so that we can implement the organization changes described in our letter dated January 15, 1988 (FPL letter L-88-23). The Topical Quality Assurance Report will be revised to reflect the new organization prior to implementation of the Technical Specification changes. These organization changes do not reduce the Quality Assurance Program commitments previously accepted by the NRC.

Very truly yours,


C. O. Woody
Executive Vice President

COW/TCG/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. Jacob Daniel Nash, Florida Dept. of Health and Rehabilitative Services

1. The first part of the document is a list of names and addresses of the members of the committee. The names are listed in alphabetical order, and the addresses are given in full. The list is as follows:

Name	Address
Mr. A. B. C.	123 Main Street, New York, N. Y.
Mr. D. E. F.	456 Broadway, New York, N. Y.
Mr. G. H. I.	789 Fifth Avenue, New York, N. Y.
Mr. J. K. L.	1010 Third Avenue, New York, N. Y.
Mr. M. N. O.	1111 Second Avenue, New York, N. Y.
Mr. P. Q. R.	1212 First Avenue, New York, N. Y.
Mr. S. T. U.	1313 West 125th Street, New York, N. Y.
Mr. V. W. X.	1414 East 125th Street, New York, N. Y.
Mr. Y. Z. A.	1515 West 125th Street, New York, N. Y.
Mr. B. C. D.	1616 East 125th Street, New York, N. Y.
Mr. E. F. G.	1717 West 125th Street, New York, N. Y.
Mr. H. I. J.	1818 East 125th Street, New York, N. Y.
Mr. K. L. M.	1919 West 125th Street, New York, N. Y.
Mr. N. O. P.	2020 East 125th Street, New York, N. Y.
Mr. Q. R. S.	2121 West 125th Street, New York, N. Y.
Mr. T. U. V.	2222 East 125th Street, New York, N. Y.
Mr. W. X. Y.	2323 West 125th Street, New York, N. Y.
Mr. Z. A. B.	2424 East 125th Street, New York, N. Y.
Mr. C. D. E.	2525 West 125th Street, New York, N. Y.
Mr. F. G. H.	2626 East 125th Street, New York, N. Y.
Mr. I. J. K.	2727 West 125th Street, New York, N. Y.
Mr. L. M. N.	2828 East 125th Street, New York, N. Y.
Mr. O. P. Q.	2929 West 125th Street, New York, N. Y.
Mr. R. S. T.	3030 East 125th Street, New York, N. Y.
Mr. U. V. W.	3131 West 125th Street, New York, N. Y.
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Mr. A. B. C.	3333 West 125th Street, New York, N. Y.
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Mr. S. T. U.	3939 West 125th Street, New York, N. Y.
Mr. V. W. X.	4040 East 125th Street, New York, N. Y.
Mr. Y. Z. A.	4141 West 125th Street, New York, N. Y.
Mr. B. C. D.	4242 East 125th Street, New York, N. Y.
Mr. E. F. G.	4343 West 125th Street, New York, N. Y.
Mr. H. I. J.	4444 East 125th Street, New York, N. Y.
Mr. K. L. M.	4545 West 125th Street, New York, N. Y.
Mr. N. O. P.	4646 East 125th Street, New York, N. Y.
Mr. Q. R. S.	4747 West 125th Street, New York, N. Y.
Mr. T. U. V.	4848 East 125th Street, New York, N. Y.
Mr. W. X. Y.	4949 West 125th Street, New York, N. Y.
Mr. Z. A. B.	5050 East 125th Street, New York, N. Y.

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Mr. Z. A. B.	5050 East 125th Street, New York, N. Y.

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

C. O. Woody being first duly sworn, deposes and says:

That he is Executive Vice President of Florida Power & Light Company, the Licensee herein;

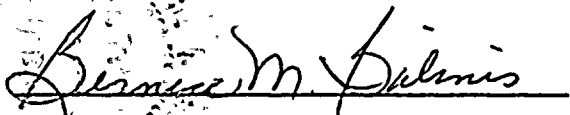
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.



C. O. Woody

Subscribed and sworn to before me this

19 day of February, 1988.



Bernice M. Palanis

NOTARY PUBLIC, in and for the County
of Palm Beach, State of Florida

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP SEPT 18, 1989
BONDED THRU GENERAL INS. UND.

My Commission expires: _____



ATTACHMENT I

DESCRIPTION OF AMENDMENT REQUEST AND
BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Re: Turkey Point Units 3 and 4
Dockets 50-250 and 50-251
Proposed License Amendment
Administrative Controls

Description of Admendment Request:

This proposed amendment revises TS 6.2.1 and TS 6.2.2 by deleting Figures 6.2-1, "Off-site Organization for Facility Management and Technical Support," and 6.2-2, "Plant Organization Chart," and replacing them with more general organizational requirements, which reflect the significant organizational features now depicted in Figures 6.2-1 and 6.2-2 for ensuring that the plant will be operated safely. Organizational relationships and responsibilities will continue to be described in detail in the FPL Quality Assurance Program. Appendix B to 10 CFR 50 and 10 CFR 50.54(a)(3) govern changes to the organization described in the Quality Assurance Program. Changes to the quality assurance program description that reduce commitments previously accepted by the NRC require NRC approval prior to implementation. Deletion of these figures will eliminate the need to process license amendment requests for changes in the onsite or offsite organizations which are administrative.

TS 6.2-2, "Facility Staff," was revised by adding the requirement that the Operations Supervisor hold a Senior Reactor Operator's License. The requirement currently in Figure 6.2-2 that the Operation Superintendent hold an active NRC Senior Operator (SRO) License is not included. T.S. Section 6.3.1, "Facility Staff Qualifications" requires that each member of the facility staff meet or exceed the minimum qualifications of ANSI N13.1-1971. This standard states that at the time of appointment, the "Operations Manager" hold an SRO license. The Operations Superintendent is a senior manager at the plant who is responsible for operations, chemistry, reactor engineering and health physics. The direct supervision of operations activities is the responsibility of the Operations Supervisor who will continue to hold an active NRC SRO License. Deleting the license requirement for the Operations Superintendent will not be contrary to the requirements of Technical Specification 6.3.1 which references the qualifications of ANSI N18.1-1971 (selection and training of nuclear power plant personnel). At FPL's other licensed reactors, the ANSI requirement is met by the Operations Supervisor, and the Technical Specifications do not require the Operations Superintendent to hold an active SRO license. The original Turkey Point FSAR (Rev. 23) included a requirement for the position entitled "Assistant Plant Superintendent - Operations" to hold an SRO license. This was the highest position on the organization chart requiring an SRO license. This position no longer exists, however, this individual was shown on the chart as the direct supervisor of the "Plant Supervisors." Our proposal for the Operations Supervisor to be the highest position in the operations organization requiring an SRO license is consistent with this original organization chart because he is the direct supervisor of the Plant Supervisors-Nuclear.

FPL had requested relief from this requirement by letter L-87-481 dated November 18, 1987 to allow an individual who held an SRO license at FPL's St. Lucie Plant, but not the Turkey Point Plant, to assume the duties of Operations Superintendent. Discretionary enforcement from the T.S. Figure 6.2-2 requirement was granted by the NRC in a letter dated January 15, 1988, until the individual receives a current Turkey Point SRO license, or until the T.S. is changed to delete the requirement.

References to the "Vice President-Nuclear Operations" and/or "Group Vice President-Nuclear Energy" in T.S. 6.5.1.6.e, 6.5.1.7.e, 6.5.1.8, 6.6.1.b, 6.7.1.b, and 6.7.1.d are changed to "senior corporate nuclear officer". The proposed changes are consistent with the intent of the current T.S. regarding level of reporting and are consistent with the changes to T.S. 6.2.1.

T.S. 6.5.1.7.c is revised to require written notification "within 24 hours" vs. "immediately". This is consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors, and will allow time for a written report to be prepared.

The CNRB composition specified in T.S. 6.5.2.2 is revised to delete "Chairman: Group Vice President-Nuclear Energy" and add the "Senior Vice President-Nuclear" as a member to reflect a position title change. To be consistent with the St. Lucie Plant Technical Specifications, approved by the NRC Staff, the Chairman will not be specified. T.S. 6.5.2.2 is modified to require only that the Chairman be a member of the CNRB and that he be specified in writing. Also, "Senior Project Manager-Power Plant Engineering" is replaced by "Manager-Power Plant Engineering". This engineering department membership change provides an equivalent level of engineering expertise and experience to the CNRB.

Basis for No Significant Hazards Consideration Determination:

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for the facility 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, or (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.

Operation of Turkey Point Units 3 and 4 in accordance with the proposed amendments would not:

- (1) & (2) Involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident than previously evaluated. This change in administrative in nature, and does not involve a change in the operation, the physical configuration of the power plant, or affect the accident analysis.
- (3) Involve a significant reduction in a margin of safety.

Deletion of Figures 6.2-1 and 6.2-2 and the other the organization changes discussed above will not decrease the effectiveness of the onsite and offsite organization to manage the Turkey Point Plant or provide technical support to ensure continued safe operation.

The NRC will continue to be informed of organizational changes through other required controls. The Quality Assurance Program provides detailed descriptions of organization and responsibilities and detailed organization changes. Changes to the Quality Assurance Program description that reduce commitments previously accepted by the NRC require NRC approval prior to implementation. FPL will continue to inform the NRC of organization changes affecting its nuclear facilities.

The proposed change deleting the requirement that the Operations Superintendent hold an SRO is consistent with the requirements of T.S. 6.3.1. Plant supervisors are directly supervised by the Operations Supervisor who meets the qualifications of the "Operations Manager" in ANSI Standard N18.1 1971. Therefore, not including the SRO requirement for the Operations Superintendent will not impact safe plant operation.

The changes from "Vice President-Nuclear Operation," and/or "Group Vice President-Nuclear Energy" to "senior corporate nuclear officer" and the changes relating to the CNRB are administrative and do not affect plant operation.

The increase in time allowed to provide written notification (T.S. 6.5.1.7.c) regarding disagreement between the PNSC and the Plant Manager-Nuclear is consistent with industry practice and allows time for a written report to be prepared. Since the Plant Manager is responsible for resolving such disagreements, and also for safe operation of the plant, no decrease in any margin in safety will result.

Therefore, operation of the facility in accordance with the proposed amendment would pose no threat to the public health and safety, and would not involve a significant hazards consideration.

