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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  
 CONWAY, W.F. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, relaxing requirements for operations superintendents. Fee encl.

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SEPTEMBER 12 1988

L-88-388

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

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendment  
Senior Reactor Operator License Requirement  
for Operations Superintendent

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 be amended to modify the Turkey Point Units 3 and 4 Technical Specifications to relax the requirement that the Operations Superintendent hold a senior reactor operator (SRO) license on the Turkey Point Plant. The proposed change would require that the Operations Superintendent either hold or have held an SRO license on the Turkey Point Plant, or have held an SRO license on a similar plant (i.e. another pressurized water reactor).

FPL has 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 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. 9302 for \$150 is attached.

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L-88-388  
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The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions on this request, please contact us.

Very truly yours,

  
W. F. Conway  
Senior Vice President - Nuclear

WFC/TCG/gp

Attachments

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

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

W. F. Conway being first duly sworn, deposes and says:

That he is Senior Vice President - Nuclear, 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.

W. F. Conway  
W. F. Conway

Subscribed and sworn to before me this  
12 day of September, 1988.

Roberta S. Economy

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

Notary Public, State of Florida  
My Commission Expires June 1, 1989  
My Commission expires \_\_\_\_\_  
Bonded Thru Troy Fala Insurance, Inc.



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ATTACHMENT I

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

**TURKEY POINT UNITS 3 AND 4  
PROPOSED LICENSE AMENDMENT**

**TITLE:** Operations Superintendent Senior Reactor Operator License Requirement Deletion

**DESCRIPTION OF AMENDMENT REQUEST:**

TS 6.2.2.h (formerly Figure 6.2-2) requires that the Operations Superintendent hold a Senior Reactor Operator (SRO) license. 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 to assume the duties of the Turkey Point Plant Operations Superintendent. Discretionary enforcement from the requirement was granted by the NRC in a letter dated January 15, 1988, until the individual receives a Turkey Point SRO license, or until the TS are changed to delete the requirement.

The proposed change would relax the TS 6.2.2.h requirement so that the Operations Superintendent would have to hold or have held an SRO license on the Turkey Point Plant, or have held an SRO license on a similar plant (i.e., another pressurized water reactor).

TS 6.3.1, "Facility Staff Qualifications," would be revised to reflect the proposed SRO requirement for the Operations Superintendent.

The Operations Superintendent is a senior manager with responsibility for operations, chemistry, reactor engineering, and health physics. In the absence of the Plant Manager, the Operations Superintendent normally assumes the duties of the Plant Manager. The Turkey Point Plant organization does not have an Assistant Plant Manager position. The proposed requirement that the Operations Superintendent either hold or have held an SRO license would continue to ensure that he has the knowledge and experience commensurate with his level of responsibility. The Operations Supervisor, who has direct responsibility for operations, will continue to hold a current SRO license. These requirements provide reasonable assurance that decisions and actions during normal and abnormal conditions will be such that the plant will be operated in a safe and efficient manner.



## **BASIS FOR NO SIGNIFICANT HAZARDS 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. The proposed change is administrative in nature, and does not involve a change in the operation, physical configuration of the plant, or affect the accident analysis.

(3) Involve a significant reduction in a margin of safety. The proposed change modifying the requirement that the Operations Superintendent hold an SRO license would continue to ensure that he has the knowledge and experience required to fulfill the duties of that functional level. The Operations Supervisor, directly responsible for operations, will continue to hold a current SRO on the Turkey Point Plant.

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.