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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
GOLDBERG, J.H. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising
Tech Specs re company nuclear review board.

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FEBRUARY 07 1990

L-90-18

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
Company Nuclear Review Board

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 delete the specific composition list for the Company Nuclear Review Board (CNRB) and replace it with a more general statement defining the composition of the CNRB and specifying the requisite level of technical, operational, and nuclear management expertise for CNRB membership.

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 page 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.

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,


J. H. Goldberg
Executive Vice President

JHG/TCG/gp
Attachments

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. Jacob Daniel Nash, Florida Department of Health and
Rehabilitative Services

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

J. H. Goldberg being first duly sworn, deposes and says:

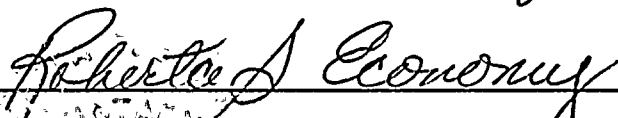
That he is Executive Vice President, of Florida Power & Light Company, the Licensee herein;

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.



J. H. Goldberg

Subscribed and sworn to before me this
7th day of February, 1990.



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

My Commission expires ☒ Notary Public, State of Florida
My Commission Expires June 1, 1993
Bonded Thru Troy Fain - Insurance Inc.



ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUEST AND

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION



TURKEY POINT UNITS 3 AND 4
PROPOSED LICENSE AMENDMENT

PLA-064

TITLE: Company Nuclear Review Board

DESCRIPTION OF AMENDMENT REQUEST:

Specification 6.5.2.2 lists by title the ten members of the CNRB. This list requires revision each time an organizational change occurs or when the titles of CNRB members are changed. In fact, the Turkey Point Technical Specifications have been revised at least three times in recent years. These changes result in the expenditure of FPL and NRC staff resources for processing license amendments which have no effect on plant safety.

To obviate the need for future amendments to the CNRB composition resulting from organizational or title changes, FPL proposes to delete the specific composition list for the CNRB and replace it with a more general statement defining the composition of the CNRB and specifying the requisite level of technical, operational, and nuclear management expertise for CNRB membership.

The proposed change requires the FPL Executive Vice President to appoint a minimum of five members to the CNRB and designate from this membership, in writing, a Chairman. The membership shall function to provide independent review and audit in the following areas as listed in Technical Specification 6.5.2.1:

- 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.

All members of the CNRB shall meet the educational requirements of ANSI/ANS-3.1-1987 standard "Selection, Qualification and Training of Personnel for Nuclear Power Plants", Section 4.7.2 and have at least 5 years of professional level experience in one or more of the fields listed in Specification 6.5.2.1. Proposed CNRB members who do not possess the educational requirements of Section 4.7.2 of ANSI/ANS-3.1-1987 (up to a maximum of two members) shall have their membership reviewed, on a case-by-case basis by the Executive Vice President, considering the alternatives to educational requirements of Sections 4.1.1 and 4.1.2 of ANSI/ANS 3.1-1987. The Chairman of the CNRB (who will also be designated in writing) shall meet the requirements of Section 4.7.1 of ANSI/ANS-3.1-1987.

The CNRB will have a minimum of five members per proposed Specification 6.5.2.2 and current Specification 6.5.2.6. Specification 6.5.2.6, Quorum, is the Technical Specification limitation on the required minimum number of members necessary for the performance of the CNRB review and audit functions. The quorum is, and will continue to be, the CNRB Chairman (or his designated alternate) and at least four CNRB members, including alternates.

The CNRB membership is proposed to be at least five members so as to permit the Executive Vice President to draw upon and assign to the CNRB the most experienced individuals. FPL's minimum CNRB composition proposal is consistent with the NRC's licensing requirements for the independent review organizations of several near term operating licenses. This revision to the Technical Specifications will provide FPL with the required flexibility to implement organizational modifications within the limitations of Specification 6.2, Onsite and Offsite Organization. Future revisions to FPL's Nuclear Energy Department are envisioned to incorporate, within the charter of the CNRB, increased responsibility and oversight. The CNRB membership will draw upon a more senior and more experienced pool of individuals (i.e., a more restricted fraternity of members). These individuals will provide the necessary cumulative experience in the fields of Specification 6.5.2.1, and will further enhance the CNRB's already significant review and audit function.

The focusing of the CNRB membership designation authority with the Executive Vice President, the referenced educational and experience requirements of ANSI/ANS-3.1-1987, as well as the flexibility to restrict the required membership will result in no reduction in the collective talents of the CNRB. In fact, FPL envisions an improvement in the already high level of quality and scope of CNRB independent audit and review.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulations, 10 CFR 50.92, which states that no significant hazards considerations are involved if the 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. Each standard is discussed as follows:

- (1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative in nature and do not affect assumptions contained in the safety analyses nor do they affect Technical Specifications that preserve safety analysis assumptions. Additionally, these changes do not modify the physical design and/or operation of the plant. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

- (2) Use of the modified specification would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed are administrative in nature and will not lead to material procedural changes or to physical modifications to the facility. Therefore, the proposed changes do not create the possibility of a new or different kind of accident.

- (3) Use of the modified specification would not involve a significant reduction in a margin of safety.

The changes being proposed are administrative in nature and do not relate to or modify the safety margins defined in or required and maintained by the Technical Specifications. The deletion of the list of Company Nuclear Review Board (CNRB) members, and replacement with qualification requirements guidelines will not decrease the effectiveness of this organization's independent review scope nor will there be a reduction in the collective talents of the CNRB.

Based on the above, we have determined that the proposed amendment does not (1) involve significant increase in the probability of consequences of an accident previously evaluated, (2) create the probability of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazard consideration.