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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
 BOHLKE, W.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 Spech 6.0 to reflect present organizational titles &
 changing composition of plant nuclear safety committee.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

FEBRUARY 21 1991

L-91-006
10 CFR 50.90

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Organizational Titles and PNSC Membership

Gentlemen:

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify Turkey Point Units 3 and 4 Technical Specifications Section 6.0, "Administrative Controls". The purpose of this amendment is to revise Technical Specification Section 6.0, to reflect (a) the present organizational titles for Florida Power and Light Company Nuclear Division and (b) change the composition of the Plant Nuclear Safety Committee (PNSC).

FPL initially submitted this proposed license amendment under letter L-90-322, dated October 3, 1990. As a result of discussions between the NRC subsequent to the initial review, FPL now proposes to amend the entire L-90-322 submittal, by this enclosure.

FPL has determined that the proposed license amendment does not involve a significant hazard pursuant to 10 CFR 50.92. A description of the amendment request is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specification change is provided in Attachment 2. Attachment 3 provides the proposed revised technical specification changes.

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.

The Topical Quality Assurance Report was revised to reflect the organizational title definitions. These organizational title definitions will not reduce the FPL Topical Quality Assurance Program commitments.

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L-91-006

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

Very truly yours,



W. H. Bohlke

Vice President

Nuclear Engineering and Licensing

WHB/RJT/rjt

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

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

W. H. Bohlke being first duly sworn, deposes and says:

That he is Vice President, Nuclear Engineering and Licensing, of Florida Power and Light Company, the Licensee herein;

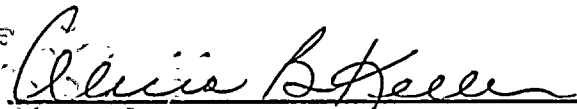
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



W. H. Bohlke

Subscribed and sworn to before me this

21st day of February, 1991.



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

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. DEC. 25, 1994
BONDED THRU GENERAL INS. UND.

My Commission expires _____

[illegible]

ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUEST

DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment revises Section 6.0, "Administrative Controls", of the Turkey Point Units 3 and 4 Technical Specifications to (a) add general organizational titles and (b) change the composition of the Plant Nuclear Safety Committee. The corresponding descriptions are provided below.

General Organizational Titles

References to the "Senior Vice President - Nuclear" or "Executive Vice President - Nuclear" are changed to "President - Nuclear Division" to establish the individual responsible for all nuclear facility operation. The title "President - Nuclear Division" is assigned to a particular officer of FPL and this assignment is clearly indicated in the FPL Total Quality Assurance Report (FPLTQAR 1-76A). This topical report contains the description of the FPL Quality Assurance Program relative to FPL's nuclear power plants.

Section 1.0 (TQR 1.0) of FPLTQAR 1-76A discusses FPL's organizational structure. Section 1.2.1, Nuclear Division, provides a detailed discussion of the organizational structure and positional responsibilities for the control of, and responsibility for, nuclear power plant design, preoperational and start-up testing, operation, maintenance, refueling, and modification of the plants in accordance with written and approved procedures. In this section FPL defines the responsibilities of the President - Nuclear Division.

Organizational relationships and responsibilities will continue to be described in detail in the FPL Topical Quality Assurance Report. Appendix B of 10 CFR 50 and 10 CFR 50.54 (a)(3) govern changes to the organizations described in the Topical Quality Assurance Report. Changes to this program description which reduce commitments previously accepted by the NRC will require NRC approval prior to implementation.

Revisions and changes to FPLTQAR 1-76A are made in accordance with a Quality Procedure as outlined in Section 2.0 of the topical. A change to the FPL Nuclear Division Officer designated as the President - Nuclear Division was accomplished in accordance with a Quality Procedure and the proposed change was evaluated against the requirements of 10 CFR 50.54 (a)(3). A change to the officer designated as the President - Nuclear Division that is evaluated as reducing commitments made to the NRC would, necessarily, be submitted to the NRC for prior review and approval. A change to the officer designated as the President - Nuclear Division that does not reduce a commitment to the NRC would be submitted to the NRC at least annually.

L-91-006
Attachment 1
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Composition of Plant Nuclear Safety Committee

Specification 6.5.1.2 lists by title the members of the Plant Nuclear Safety Committee (PNSC). This list requires revision each time an organizational change occurs or when the titles of PNSC members are changed.

The proposed change requests the addition of the "Licensing Superintendent" as a member of the Plant Nuclear Safety Committee (PNSC). In addition, the title of the "Quality Control Supervisor" is changed to "Quality Control Superintendent" to support an organizational change in title. Representation of the Licensing Superintendent on the PNSC shall significantly improve the Technical Specification interpretation and compliance requirements as governed by the PNSC responsibilities.

Specification 6.5.1.6, Responsibilities, are not impacted by this change.

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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

- (2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident previously evaluated.

The NRC has previously approved the division of responsibility between the "Senior Vice President-Nuclear" and the "Executive Vice President" as described in Section 6.0 of the Turkey Point Units 3 and 4 Technical Specifications. The proposed amendment would ensure a consistent corporate responsibility by substituting the "President - Nuclear Division" for either the "Senior Vice President - Nuclear" or "Executive Vice President" and thus establish the senior corporate nuclear officer responsible for overall plant nuclear safety.

The proposed change in the composition of the Plant Nuclear Safety Committee (PNSC) will have no impact on the responsibilities and effectiveness of this committee.

The changes being proposed are administrative in nature and will not affect plant safety analysis assumptions, lead to material procedure 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) Operation of the facility in accordance with the proposed amendment 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, and maintained by, the Technical Specifications. The NRC will continue to be informed of organizational changes through controlled mechanisms. The Topical Quality Assurance Report provides a detailed description of organization and responsibilities as well as detailed organizational charts. The change to the composition of the PNSC will have no impact on the effectiveness of the individual review process.

Based on the above, FPL has determined that the amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (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; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.

Changes to the Topical Quality Assurance Report are governed by 10 CFR 50.54(a) (3). Changes to the Topical Quality Assurance Report description that reduce commitments previously accepted by the NRC require NRC approval prior to implementation. FPL will continue to inform the NRC of organizational changes affecting the Turkey Point Plant.

