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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
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, to modify
 TS 6.0, "Administrative Controls," to revise TSs 6.2.2.h,
 5.2.2.i & 6.3, to modify requirement that Operations Manager
 shall hold, SRO at plant or semilar plant.

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L-93-033
10 CFR 50.90

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 Amendments
Operations Manager Qualifications

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 Turkey Point Units 3 and 4 Technical Specifications Section 6.0, "Administrative Controls." The purpose of these amendments is to revise Technical Specifications 6.2.2.h. and 6.2.2.i, "Plant Staff," and 6.3, "Facility Staff Qualifications," to modify the requirement that the Operations Manager shall hold, or have held, a Senior Reactor Operator License at Turkey Point or on a similar plant. FPL proposes to require that either the Operations Manager or the Operations Supervisor hold an active Senior Reactor Operator License at Turkey Point.

A safety analysis of the amendments request is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazard pursuant to 10 CFR 50.92. 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 Specifications.

In accordance with 10 CFR 50.91 (b)(1), a copy of these proposed license amendments are being forwarded to the State Designee for the State of Florida. FPL requests that the NRC review and approve this amendments request as expeditiously as possible, and prior to March 31, 1993, to permit the implementation of organizational changes prior to the April 10, 1993, commencement of the Unit 4 refueling outage.

The proposed amendments have 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,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/ew

Attachments

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

an FPL Group company

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STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

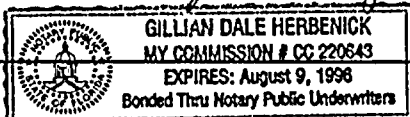
That he is Vice President, Turkey Point Nuclear Plant, of Florida Power and Light Company, the Licensee herein;

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.

T F Plunkett
T. F. Plunkett

Subscribed and sworn to before me this

11th day of February, 1993.



Gillian Dale Herbenick

Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of
Dade, State of Florida

My Commission expires August 9, 1996
Commission No. CC 220643

T. F. Plunkett is personally known to me.

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ATTACHMENT 1
Safety Analysis

Safety Analysis

Introduction and Purpose

To provide additional organizational flexibility, Florida Power & Light Company (FPL) proposes to change the Technical Specifications requirement that the Operations Manager either hold or have held a Senior Reactor Operator (SRO) License on the Turkey Point Plant, or have held a Senior Reactor Operator License on a similar plant. FPL believes that the proposed changes will result in the operations department off-shift management organization continuing to meet or exceed the minimum facility staff qualifications of standard ANSI N18.1-1971 for comparable positions. The basis for FPL's conclusion is discussed below.

The proposed amendments revise Specification 6.0, "Administrative Controls," of the Turkey Point Units 3 and 4 Technical Specifications to change the Technical Specifications requirement that the Operations Manager either hold or have held a Senior Reactor Operator License on the Turkey Point plant, or have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor). FPL proposes to require that either the Operations Manager or the Operations Supervisor hold an active Senior Reactor Operator License at Turkey Point. A description of these changes is provided below.

Current Requirements

Turkey Point Units 3 and 4 Technical Specification 6.2.2.h. requires

The Operations Supervisor shall hold a Senior Reactor Operator License.

Turkey Point Units 3 and 4 Technical Specification 6.2.2.i requires

The Operations Manager shall either hold or have held a Senior Reactor Operator License on the Turkey Point Plant, or have held a Senior Reactor Operator License on a similar plant (i.e. another pressurized water reactor).

Technical Specification 6.3.1 states,

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations Manager whose requirement for a Senior Reactor Operator License is as stated in Specification 6.2.2.i. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in 10 CFR Part 55 and ANSI 3.1, 1981.

Discussion

To provide additional organizational flexibility, Florida Power & Light Company (FPL) proposes to change the Technical Specifications requirement that the Operations Manager either hold or have held a Senior Reactor Operator License on the Turkey Point Plant, or have held a Senior Reactor Operator License on a similar plant. FPL believes that the proposed changes will result in the operations organization off-shift management organization continuing to meet or exceed the minimum facility staff qualifications of ANSI N18.1-1971 for comparable positions.

Standard ANSI N18.1-1971 states, in Section 1, that individual job titles and organizational structures vary among organizations at operating power reactors. The standard continues by stating that the standards in ANSI N18.1-1971 are predicated on levels of responsibility rather than on a particular organizational concept.

FPL's operating organization at Turkey Point Plant is shown on the attached organizational chart (Figure 1-2, Appendix A from the NRC-approved FPL Topical Quality Assurance Report (TQAR)). While the Operations Manager is responsible for the plant's operating organization, his responsibilities also include management of the plant's Health Physics and Chemistry departments. The on-shift operations organization is supervised by the Operations Supervisor, who is currently required by Technical Specification 6.2.2.h. to hold a Senior Reactor Operator License. This position most closely aligns with the ANSI N18.1-1971 position of "Operations Manager." The Operations Supervisor and Nuclear Plant Supervisors maintain SRO Licenses on Turkey Point.

While ANSI N18.1-1971 states that the Operations Manager shall hold a Senior Reactor Operator License at the time of appointment to the position, FPL believes that the organizational intent of the position meeting that standard at Turkey Point is the Operations Supervisor. Additionally, the standard is less restrictive in the license requirements for that position in that the incumbent for the ANSI N18.1-1971 "Operations Manager" position is not required to maintain an SRO License, only to hold one at the time of appointment to the active position.

The Turkey Point Plant on-shift operations organization manning requirements are called out in the Turkey Point Units 3 and 4 Technical Specification Table 6.2-1, MINIMUM SHIFT CREW COMPOSITION. These minimum shift manning requirements for a two unit site with a common control room meet the requirements of 10 CFR §50.54(m). FPL does not propose to change any shift manning requirements by this proposed change. Additionally, the on-shift and off-shift organizations provide for an individual who meets the requirements of 10 CFR §50.54(l) for a licensed individual who directs the licensed activities of licensed operators.

Proposed Technical Specifications Changes

1. FPL proposes to change Technical Specification 6.2.2.h. to read as follows (with the proposed changes in bold-face type).

The Operations Manager or Supervisor shall hold a

Senior Reactor Operator License.

Justification: While the Operations Manager is responsible for the plant's operating organization, his responsibilities also include management of the plant's Health Physics and Chemistry departments (see attached organization chart). The on-shift operations organization is directed and supervised by the Operations Supervisor, who is currently required by Technical Specification 6.2.2.h. to hold a Senior Reactor Operator License. Therefore, to meet the management oversight intent of ANSI N18.1-1971, either the Operations Manager or the Operations Supervisor shall hold an SRO License at Turkey Point Plant. This change permits FPL to exercise its discretion in the assignment of highly qualified individuals to operations organization management positions.

2. FPL proposes to delete, in its entirety, Technical specification 6.2.2.i.

Justification: The proposed revision to Technical Specification 6.2.2.h. discussed above will ensure that at least one individual in the operations organization off-shift management chain of command holds an SRO License at Turkey Point. The proposed change will delete the permissibility of the Operations Manager having held an SRO at another pressurized water reactor. The proposed change will require that, if the Operations Manager is the individual designated as the licensed individual in the operations organization off-shift management chain of command who requires an SRO License to meet the ANSI N18.1-1971 guidance and the requirements of the Turkey Point Technical Specifications, that individual will hold an active SRO License at Turkey Point.

3. FPL proposes to amend Technical Specification 6.3.1, which reads in part (with the proposed change in bold-face type).

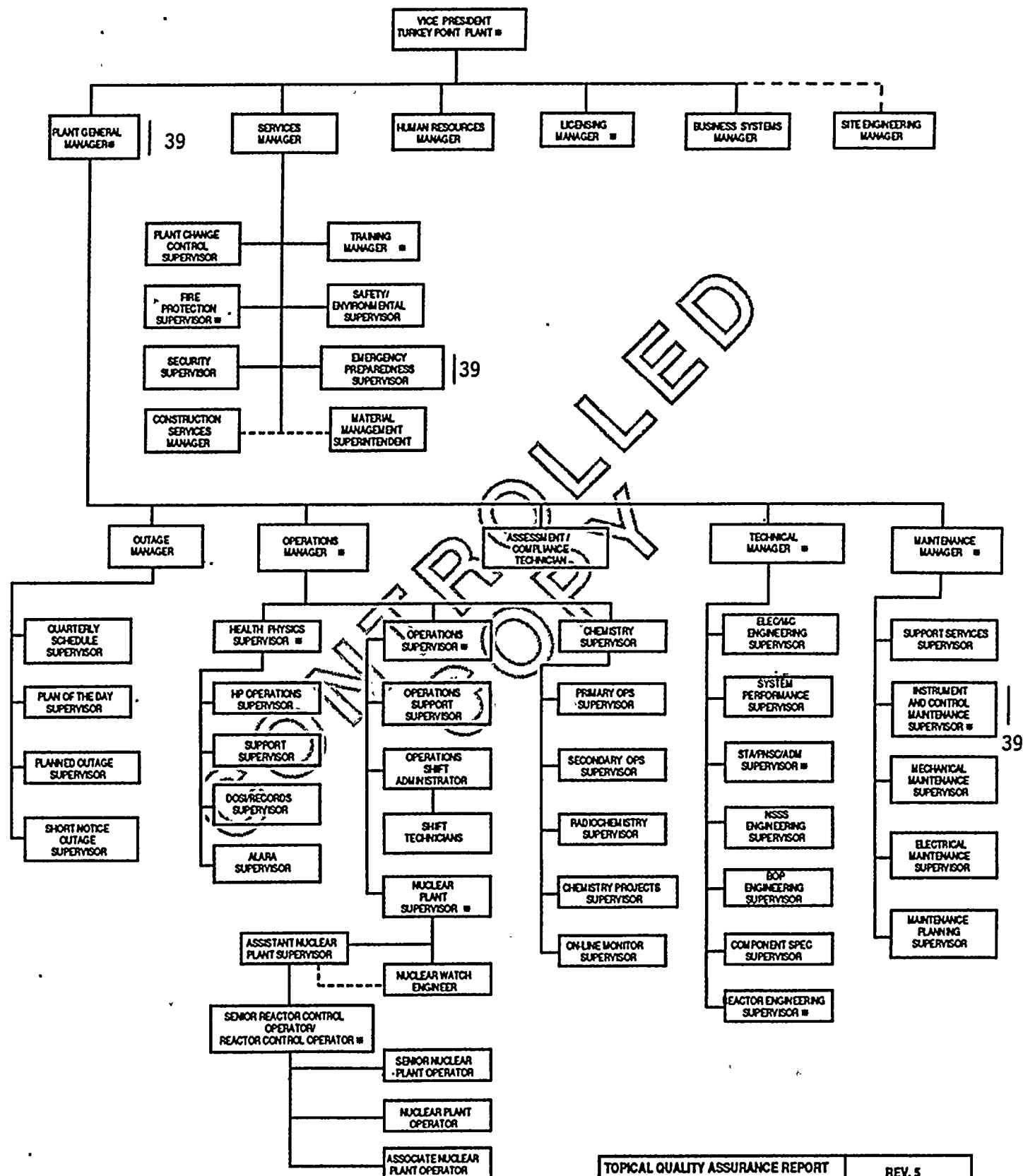
Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations Manager **or Operations Supervisor** whose requirement for a Senior Reactor Operator License is as stated in Specification 6.2.2.h. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in 10 CFR Part 55 and ANSI 3.1, 1981.

Justification: The proposed change to this Technical Specification is editorial in nature in that FPL proposes to delete Technical Specification 6.2.2.i in its entirety and to incorporate the SRO License requirement for the Operations Manager or Operations Supervisor in Technical Specification 6.2.2.h.

Summary

FPL proposes to require that the Operations Manager hold an SRO License at Turkey Point if the Operations Manager is the individual designated as the licensed individual in the operations organization off-shift management chain of command who requires an SRO License to meet the ANSI N18.1-1971 guidance and the requirements of the Turkey Point Technical Specifications. FPL proposes to delete the Technical Specification which permits the Operations Manager to either hold or have held a Senior Reactor Operator License on the Turkey Point plant, or have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor). In lieu of this requirement, the Technical Specifications will require either the Operations Manager or the Operations Supervisor hold a Senior Reactor Operator License at Turkey Point. Finally, FPL proposes to make an editorial change in the Technical Specification which addresses facility staff qualifications to address the above proposed changes.

FPL's proposed changes are consistent with the intent of ANSI N18.1-1971 with respect to the standard's guidance for a licensed senior operator in the operations organization off-shift management chain of command. The qualifications guidance of standard ANSI N18.1-1971, as required by Turkey Point Technical Specification 6.3.1, FACILITY STAFF QUALIFICATIONS, will ensure that the individual filling the Operations Manager position has the requisite education and experience for the management position. Additionally, the proposed changes do not impact nor change, in any way, the minimum on-shift manning or qualifications for those individual responsible for the actual licensed operation of the facility. The Operations Supervisor and Nuclear Plant Supervisors maintain SRO Licenses on Turkey Point. FPL's operating organization at Turkey Point Plant is presented in Figure 1-2, Appendix A of the NRC-approved FPL TQAR.



TOPICAL QUALITY ASSURANCE REPORT	REV. 5
TURKEY POINT NUCLEAR SITE ORGANIZATION FIGURE 1-2 APPENDIX A	1/15/92
	PAGE 1 OF 1

Attachment 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendments

Turkey Point Units 3 and 4 Technical Specification (TS) 6.3.1 requires each member of the unit staff meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. Besides education and experience requirements, the Operations Manager must hold, or have held, an NRC Senior Operator License (SRO) on Turkey Point, or have held an SRO License on a similar plant (i.e. another pressurized water reactor) per TS 6.2.2.i.

FPL proposes to change Technical Specification 6.2.2.h. to read as follows (with the proposed change in bold-face type).

The Operations **Manager or** Supervisor shall hold a Senior Reactor Operator License.

FPL proposes to delete, in its entirety, Technical Specification 6.2.2.i.

FPL proposes to amend Technical Specification 6.3.1, which reads (with the proposed change in bold-face type)

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations Manager **or Operations Supervisor** whose requirement for a Senior Reactor Operator License is as stated in Specification 6.2.2.h. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in 10 CFR Part 55 and ANSI 3.1, 1981.

Introduction

The Nuclear Regulatory 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 below for the proposed license amendments.

Discussion

- (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, address organizational issues, 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.

The individual Florida Power & Light Company (FPL) chooses to fill the position of Operations Manager will have extensive educational and management-level nuclear power experience meeting the criteria of standard ANSI N18.1-1971. The Operations Supervisor and Nuclear Plant Supervisors maintain SRO Licenses on Turkey Point. The current Technical Specifications do not require the Operations Manager to hold an active SRO License at Turkey Point. In fact, the current Technical Specifications permit the Operations Manager to have held an SRO License on a similar plant (i.e. another pressurized water reactor). Since the proposed change will continue to require that at least one individual in the operations organization off-shift management chain of command hold an SRO License at Turkey Point, there will be no change in the operations management operational experience at Turkey Point.

Additionally, the proposed changes do not impact nor change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the facility.

Based on the above, 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 from any 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. The proposed changes address organizational and qualifications issues related to the criteria used for assignment of individuals to the operations organization off-shift management chain of command. In light of the above, and since the proposed changes do not impact nor change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the facility, operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) **Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.**

The proposed changes address organizational and qualifications issues related to the criteria used for assignment of individuals to the operations organization off-shift management chain of command. The proposed changes do not impact nor change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the

facility. FPL's operating organization at Turkey Point Plant is shown on Figure 1-2, Appendix A of the NRC-approved FPL Topical Quality Assurance Report (TQAR). Since changes to the TQAR are governed by 10 CFR §50.54(a)(3), any changes to the TQAR that reduce commitments previously accepted by the NRC require approval by the NRC prior to implementation. FPL will continue to inform the NRC of any organizational changes affecting Turkey Point Plant.

While the Operations Manager is responsible for the plant's operating organization, his responsibilities also include management of the plant's Health Physics and Chemistry departments. The on-shift operations organization is supervised and directed by the Operations Supervisor, who is currently required by Technical Specification 6.2.2.h. to hold a Senior Reactor Operator License. Since the Technical Specifications do not require that the Operations Manager maintain an SRO License (nor even that the incumbent has ever held a Senior Reactor Operator License at Turkey Point), the other qualifications guidance of standard ANSI N18.1-1971, as required by Turkey Point Technical Specification 6.3.1, FACILITY STAFF QUALIFICATIONS, will ensure that the individual filling the Operations Manager position has the requisite education and experience for the management position. As a result, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Summary

Based on the above, FPL has determined that the amendments 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.