

# CATEGORY 1

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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  
HOVEY,R.J. Florida Power & Light Co.  
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, modifying  
TS Section 6.0, "Administrative Controls," IAW 10CFR50.90 to  
address licensed qualifications of Operations Manager.

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L-96-119  
10 CFR §50.36  
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

Florida Power & Light Company (FPL) proposes to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 by modifying the Turkey Point Units 3 and 4 Technical Specifications Section 6.0, "Administrative Controls," in accordance with 10 CFR 50.90. The purpose of these amendments are to address the licensed qualifications of the Operations Manager.

A Safety Analysis of the revised 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. The proposed amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

FPL requests that the NRC review and approve this amendments request as expeditiously as possible to permit the prompt implementation of organizational changes.

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

Very truly yours,

040025

R. J. Hovey  
Vice President  
Turkey Point Nuclear

JEK 9606040140 960528  
PDR ADOCK 05000250  
PDR

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

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STATE OF FLORIDA)


COUNTY OF DADE

) ss.  
)

R. J. Hovey being first duly sworn, deposes and says:

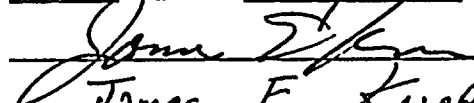
That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

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.

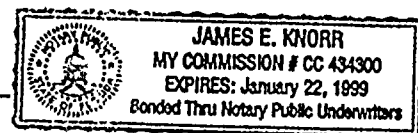
  
\_\_\_\_\_  
R. J. Hovey

Subscribed and sworn to before me this

28<sup>th</sup> day of May, 1996.

  
\_\_\_\_\_  
James E. Knorr

Name of Notary Public (Type or Print)



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

My Commission expires Jan 22, 1999  
Commission No. CC 434300

R. J. Hovey is personally known to me.

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U.S. DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
WASHINGTON, D.C.

ATTACHMENT 1

**SAFETY ANALYSIS**

## Safety Analysis

### **Introduction and Purpose**

To provide additional organizational flexibility while ensuring an equivalent qualified level of management oversight, 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 except as modified by Technical Specification 6.2.2.i. The basis for FPL's conclusion is discussed below.

The proposed amendments revise Specification 6.2.2.i, "Administrative Controls," of the Turkey Point Units 3 and 4 Technical Specifications. FPL proposes to require that the Operations Manager either, (1) hold or have held a Senior Reactor Operator License at Turkey Point; or, (2) have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); or (3) completed the Turkey Point Nuclear Plant Senior Management Operations Training Course. A description of, and justification for, these changes are provided below.

### **Current Requirements**

Turkey Point Units 3 and 4 Technical Specification 6.2.2. requires

h. The Operations Supervisor shall hold a Senior Reactor Operator License.

I. The Operations Manager shall either:

1. hold or have held a Senior Reactor Operator License on the Turkey Point Plant; or,
2. have held a Senior Reactor Operator License on a similar plant (i.e. another pressurized water reactor); or,
3. have held a Senior Reactor Operator License on a boiling water reactor and completed the Turkey Point Nuclear Plant Senior Management Operations Training Course.





## Discussion

To provide additional organizational flexibility, FPL proposes to amend Technical Specification 6.2.2.i. to remove the qualification condition for filling the Operations Manager position, of having held an SRO license at a boiling water reactor, and maintain the requirement for completion of the Turkey Point Nuclear Plant Senior Management Operations Training Course. The proposed changes will result in the Operations department off-shift management organization continuing to meet or exceed the minimum facility staff qualifications of ANSI N18.1-1971 for comparable positions.

FPL's operating organization at Turkey Point Plant is shown in the enclosed organizational chart (Enclosure 1) (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 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. The Operations Supervisor and Nuclear Plant Supervisors maintain SRO Licenses on Turkey Point.

The Turkey Point Plant on-shift Operations organization shift complement is called out in the Turkey Point Units 3 and 4 Technical Specification Table 6.2-1, MINIMUM SHIFT CREW COMPOSITION. This minimum shift complement requirement for a two unit site with a common control room meets 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 operations organization provides for an individual who meets the requirements of 10 CFR §50.54(l) for an SRO licensed individual who directs the licensed activities of licensed operators.

The discussion used in this proposed license amendment is essentially the same as that for Wisconsin Electric Power Company Point Beach Nuclear Plant Units 1 and 2, in October 1995, Amendment Nos. 164 and 165 to Facility Operating License Nos. DPR-24 and DPR-27.

Technical Specification 6.3.1 requires members of the Turkey Point staff to meet or exceed the minimum qualifications of ANSI N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel." Specification 6.2.2.i. modifies the requirements of ANSI N18.1. The proposed change would revise the Operations Manager qualification requirements from those listed in the standard as modified by Specification 6.2.2.i., to require that the Operations Manager hold or have previously held a senior reactor operator license for Turkey Point or for a similar unit or otherwise be certified at an equivalent knowledge level. An Operations middle manager (Operations Supervisor), to whom the operating crews report,



shall be required by Technical Specification 6.2.2.h. to hold an SRO license for Turkey Point from the NRC. ANSI/ANS 3.1-1987, which updated ANSI N18.1, introduced standards which further delineated the qualification requirements for operations management, allowing the Operations Manager to hold a senior reactor operator license, have held an SRO license for a similar unit, or be certified by use of other criteria. ANSI/ANS 3.1-1987 also states that if the Operations Manager does not hold an NRC license, then the operations middle manager shall hold an SRO license. The proposed specification meets this portion of the standard and in addition, by requiring the Operations Supervisor to hold an SRO License (Specification 6.2.2.h.), ensures that the operating crews will report to an NRC SRO-licensed individual which is equivalent to the requirement in the present Specification 6.2.2.i. Therefore, the proposed change continues to meet acceptable qualification standards.

Section 50.54(1) of Title 10 of the Code of Federal Regulations states those individuals responsible for directing the licensed activities of licensed operators shall be licensed as senior operators. The proposed change, which provides additional flexibility, continues to meet this requirement by ensuring operations management maintains the appropriate qualification levels.

Since all regulatory requirements and acceptable standards continue to be met by the proposed specifications, as well as meeting the intent of existing Technical Specifications, FPL has concluded that there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be adverse to the common defense and security or to the health and safety of the public.

The proposed Technical Specification ensures that the Operations Manager will have the training experience normally required for the Operations Manager position as well as that required for examination by the NRC for an SRO license. The proposed change will continue to require the completion of the Turkey Point Nuclear Plant Senior Management Operations Training Course and will continue to require that the Operations Supervisor hold an SRO license. Details of the Turkey Point Nuclear Plant Senior Management Operations Training Course were provided to the staff in a license amendment application for Turkey Point (L-93-108) which was approved as Amendment No. 155 to Facility Operating License No. DPR-31 and Amendment No. 149 to Facility Operating License No. DPR-41 on August 4, 1993.

### Proposed Technical Specifications Changes

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

The Operations Manager shall either:

- (1) hold or have held a Senior Reactor Operator License on the Turkey Point Plant; or,
- (2) have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); or,
- (3) have ~~held a Senior Reactor Operator License on a boiling water reactor and~~ completed the Turkey Point Nuclear Plant Senior Management Operations Training Course (i.e., certified at an appropriate simulator for equivalent senior operator knowledge level).

Justification: The proposed revision to Technical Specification 6.2.2.i. discussed above will ensure that the individual filling the Operations Manager's position meets regulatory requirements and ensures knowledge levels equivalent to existing license requirements for operations management. This requirement will ensure that the Operations Manager has the nuclear plant experience required by ANSI N18.1-1971, for equivalent knowledge level, as updated by ANSI/ANS 3.1-1987, for the Operations Manager position. The proposed change will require the Operations Manager to have completed the Turkey Point Nuclear Plant Senior Management Operations Training Course unless an SRO license is or has been held at Turkey Point or was held at another pressurized water reactor. The parenthetical phrase (i.e., certified at an appropriate simulator for equivalent senior operator knowledge level) has been added to clarify the level of training conducted in the Senior Management Operations Training Course. This change will permit FPL to exercise additional discretion in the assignment of highly qualified individuals to Operations management positions.

### Summary

FPL proposes to permit three options for Senior Reactor Operator licensing for the Operations Manager at Turkey Point. Any of these three options meets the intent of ANSI N18.1-1971 with respect to the Operations Manager having the experience and training necessary to successfully and safely direct the activities of the Operations department.

FPL's proposed changes are consistent with the intent of ANSI N18.1-1971 with respect to the standard's guidance for a licensed

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Attachment 1  
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senior operator in the Operations' organization off-shift management chain of command. The Turkey Point Technical Specification 6.3.1, FACILITY STAFF QUALIFICATIONS, will ensure that, other than license certification, the individual filling the Operations Manager position has the requisite education, training, 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 individuals 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.

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Attachment 1

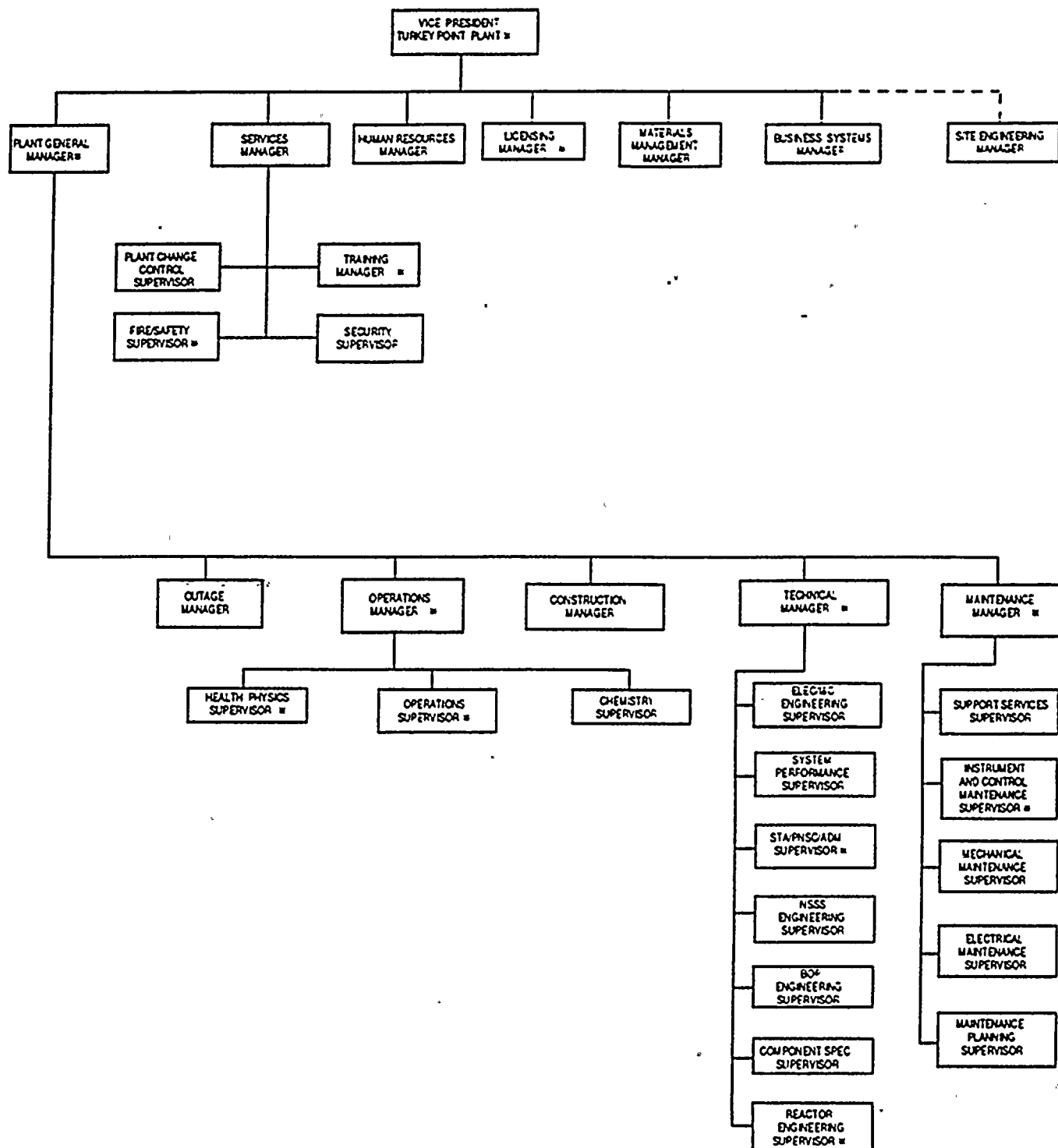
Enclosure 1

to

Attachment 1

FPL Topical Quality Assurance Report

Appendix A, Figure 1-2



\* - Indicates position with accountabilities in Technical Specifications.

TOPICAL QUALITY ASSURANCE REPORT	REV. 6
TURKEY POINT NUCLEAR SITE ORGANIZATION FIGURE 1-2 APPENDIX A	2/1/94
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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 to meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. Besides education and experience requirements, the Operations Manager meets the requirements of TS 6.2.2.i.

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

The Operations Manager shall either:

- (1) hold or have held a Senior Reactor Operator License on the Turkey Point Plant; or,
- (2) have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); or,
- (3) ~~have held a Senior Reactor Operator License on a boiling water reactor and~~ completed the Turkey Point Nuclear Plant Senior Management Operations Training Course (i.e., certified at an appropriate simulator for equivalent senior operator knowledge level).

**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 change being proposed is administrative in nature, addresses organizational and personnel qualification issues, and does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, or 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 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 SRO License at Turkey Point. The current Technical Specifications permit the Operations Manager to have held an SRO License on another plant. The proposed change will continue to require that the Operations Manager has completed the Turkey Point Nuclear Plant Senior Management Operations Training Course if the incumbent did not previously hold an SRO license. The Turkey Point Nuclear Plant Senior Management Operations Training Course ensures that the Operations Manager has the training on plant-specific systems and procedures at Turkey Point and a knowledge level equivalent to the license requirements for operations management.

The on-shift Operations' organization is, and will continue to be, supervised and directed by the Operations Supervisor, who is currently required by Technical Specification 6.2.2.h. to hold an SRO License.

Additionally, the proposed changes do not impact or change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the facility as required by 10 CFR 50.54(1).

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 change being proposed is administrative in nature, addresses personnel qualification issues, does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, or 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. Since the proposed change does not impact or 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 change addresses organizational and qualification issues related to the criteria used for assignment of individuals to the Operations organization off-shift management chain of command. The proposed change does not impact or 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.

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 Operations organization is supervised and directed by the Operations Supervisor, who is required by Technical Specification 6.2.2.h. to hold a Senior Reactor Operator License. The Turkey Point Units 3 and 4 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 Turkey Point Technical Specification 6.3.1, FACILITY STAFF QUALIFICATIONS, will ensure that, other than license certification, the individual filling the Operations Manager position has the requisite education, training, 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.