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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
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, modifying
Turkey Point Units 3 & 4 TS to allow use of 12 hour shifts
for nominal 40 (36 to 48) hour week.

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L-97-202
10 CFR §50.90

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

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Plant Staff and Work Hours

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 the Turkey Point Units 3 & 4 Technical Specifications, to allow use of 12 hour shifts for a nominal 40 (36 to 48) hour week.


FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR §50.92. A description of the amendments request and justification is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specification changes 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 license 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,


R. J. Hovey
Vice President
Turkey Point Plant

JEK

Attachments

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cc: L. A. Reyes, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant
W. A. Passetti, Florida Department of Health and Rehabilitative
Services

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

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;

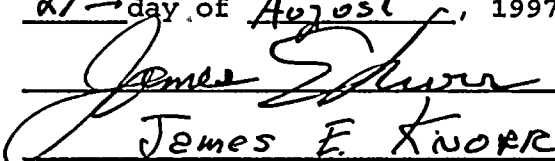
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



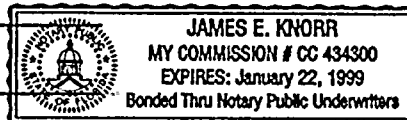
R. J. Hovey

Subscribed and sworn to before me this

27th day of August, 1997.



Name of Notary Public (Type or Print)



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

R. J. Hovey is personally known to me.



Handwritten scribble or signature, possibly reading "J. H. H."

RECEIVED
JAN 10 1964
U.S. DEPARTMENT OF AGRICULTURE
WASHINGTON, D.C.

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

DESCRIPTION AND PURPOSE

Florida Power and Light Company (FPL) is requesting that Appendix A of Facility Operating Licenses DPR-31 and DPR-41, for Turkey Point Units 3 and 4 respectively, be revised to allow for the use of 12-hour shifts. The 12-hour shifts would provide for a reduced number of turnovers each day. This would allow for better communications and continuity. Using a 12 hour shift schedule results in more consecutive days off between work periods and therefore more rested personnel. The objective with these shifts would be to work a nominal 40 hour week (for example three consecutive working days or four consecutive working days with a minimum of 2 consecutive days off or a maximum of eight consecutive days off comprising a four week rotation) during normal plant operation. This would result in a 2100 hour normally scheduled work year as opposed to a 2000 hour work year assuming two weeks of vacation.

Changes are proposed to revise Turkey Point Units 3 and 4 Technical Specifications Administrative Controls Section 6.2.2.f. to delete the discussion of specific work hours and control the shift schedule with an administrative procedure. The revised Technical Specification will require the procedural controls to include guidelines on the working hours which will ensure that adequate shift coverage is maintained without heavy use of overtime for individuals. The limits on overtime are now part of the Technical Specifications and will be retained.

BACKGROUND

Turkey Point Units 3 and 4 now maintain an 8 hour shift schedule. Each day has 3 turnovers from one operating crew to the next. The 12 hour shift would reduce that to two each day. FPL desires to change to the 12 hour shift to reduce the potential for errors during turnover and to increase the consecutive days off between the alternating 3 and 4 day work weeks. This change to the Technical Specifications is patterned after that of the Salem Generating Stations Units 1 and 2, which was approved on December 17, 1996.

DISCUSSION AND DESCRIPTION OF PROPOSED CHANGES

The existing Technical Specifications state in part:

Technical Specification 6.2.2.f.

"Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating."

The following changes in plant Technical Specifications, shown in Attachment 3, are proposed:

TS 6.2.2 PLANT STAFF

REVISE TS 6.2.2.f., to delete the following sentence:

"The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating."

which will allow the use of different shift structures. FPL is proposing to delete this requirement which stipulates 8 hour shifts. FPL will incorporate into administrative procedures the controls which will allow up to 12 hour shifts which will result in an average 40 hours worked per week.

REVISE TS 6.2.2.f. to add:

words which will require the administrative procedures to include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Justification:

Twelve hour shifts provide for a reduced number of turnovers which allows for better communications and continuity from shift to shift. On a 12 hour shift schedule, each crew would receive more consecutive days

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Attachment 1

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off, and therefore have more opportunity for rest prior to returning to work.

The change to the specifications will not allow routine use of overtime. In addition, the remainder of Technical Specification 6.2.2.f. identifies the limits that are placed on overtime for each individual.

SUMMARY

The Technical Specification change will allow Turkey Point personnel to work a regularly scheduled 12 hour shift rotation.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41, for Turkey Point Units 3 and 4 respectively, be revised to delete a sentence from section 6.2.2.f and add clarification to section 6.2.2.f. of the Administrative section of Technical Specifications. The changes will allow the use of up to 12 hour shifts without routine heavy use of overtime. The Technical Specifications will require the controls and guidelines for work hours to be contained in administrative procedures.

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 amendments.

DISCUSSION

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

The proposed change does not involve a physical or procedural change to any structure, system or component that significantly effects the probability or consequences of any accident or malfunction of equipment important to safety. The proposed changes will allow the use of 12 hour shifts for a nominal 40 hours per week.

This change is only administrative in nature and has no significant impact on the probabilities or consequences of any evaluated accident or malfunction of equipment important to safety.

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

The proposed amendment will not change the physical plant or modes of plant operation defined in the Turkey Point Units 3 and 4 operating license. The proposed amendment will not involve addition or modification of permanent equipment for any systems structures or components at Turkey Point.

The change does modify the controls on working shift hours for operating personnel without significantly changing the hours worked per week and retains the current limitations on excessive overtime. The changes are administrative in nature.

Consequently, operation of either unit 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 amendments would not involve a significant reduction in a margin of safety.

The proposed amendment will allow the use of 12 hour shifts by virtue of the administrative change. This will result in fewer turnovers per day and will allow more contiguous days off between work shifts. The sum of these 12 hour work shift features will be more rested crews with better communications between shifts. The proposed change will not alter the basis for any Technical Specification that is related to the establishment of, or maintenance of, a nuclear safety margin.

Consequently, operation of Turkey Point Units 3 and 4 in accordance with this proposed amendment would not involve a significant reduction in a margin of safety.

Based on the above, FPL has determined that the proposed 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, (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.

