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SUBJECT: Application for amends to licenses DPR-31 & DPR-41, to incorporate specific staff qualifications for Multi-Discipline Supervisor position into TS.

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FPL

OCT 27 1998

L-98-170
10 CFR 50.36
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 Amendments
Facility Staff Qualifications

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Appendix A of the Facility Operating Licenses DPR-31 and DPR-41 of the Turkey Point Units 3 and 4 Technical Specifications (TS) to incorporate specific staff qualifications for a Multi-Discipline Supervisor (MDS) position.

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 is provided in Attachment 1. The No Significant Hazards Consideration Determination in support of the proposed Technical Specifications changes is provided in Attachment 2. Attachment 3 provides the proposed revisions to the Facility Operating Licenses and Technical Specification pages.

In accordance with 10 CFR 50.91(b)(1), a copy of these proposed license amendments is 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. FPL requests that these amendments be reviewed and approved by February 26, 1999.

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

Very truly yours,

R. J. Hovey
Vice President
Turkey Point Plant

SM

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Florida Department of Health and Rehabilitative Services

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ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Purpose

The proposed amendments revise the Turkey Point Units 3 and 4 Technical Specifications (TS) to amend TS 6.3 "Facility Staff Qualifications" in order to incorporate qualifications for the Multi-Discipline Supervisor (MDS). The proposed changes are discussed in detail below.

Background

As a result of continuous improvement efforts, Florida Power and Light (FPL) intends to implement multi-discipline work teams consisting of electricians, mechanics, instrument and control specialists, radiation control technicians, and field operators. These teams are essential in performing efficient work for the day-to-day maintenance of the plant. Through the establishment of these teams, FPL expects to improve teamwork, improve schedule adherence, reduce equipment out of service time, and reduce administrative burden due to fewer turnovers and hand-offs between disciplines. In order to meet the site's high standards for operational safety and reliability, the multi-discipline work teams need to have Multi-Discipline Supervisors (MDS) with the necessary education, experience, and training to oversee the tasks performed.

Currently at FPL, the regulatory requirements for qualifications of supervisors not requiring licenses are defined in Turkey Point Units 3 and 4 TS Section 6.3.1, "Facility Staff Qualifications." TS 6.3.1 references ANSI N18.1-1971, which requires non-licensed supervisors to have a high school diploma or equivalent and a minimum of four years of experience in the craft or discipline they supervise.

The current TS requirements assume single discipline supervisors. The requirements for the MDS position are not defined in an ANSI standard. The MDS position is discussed in the Institute of Nuclear Power Operations (INPO) Academy Document (ACAD) 90-010, Rev 2, "Guidelines for Maintenance Supervisor Selection, Training, and Development." The ACAD specifically discusses supervisors that have oversight responsibility for multi-discipline work teams. The ACAD denotes that these supervisors will have a fundamental working knowledge of the tasks being performed as well as broad knowledge of applicable station work practices, industrial safety practices, and "soft skills" necessary to effectively interact with team members.

FPL proposes to amend the TS in order to incorporate specific qualification requirements applicable to MDS.

Discussion

According to ANSI N18.1-1971, as referenced in TS Section 6.3.1, non-licensed supervisors must have a high school diploma or equivalent and a minimum of four years of experience in the craft or discipline they supervise. At this time, non-licensed supervisors meet or exceed ANSI N18.1-1971 requirements. Besides meeting the education and experience requirements, the supervisors are further prepared with appropriate supervisor training.

In accordance with 10 CFR 50.120, the current FPL maintenance supervisor training program is based on a Systems Approach to Training (SAT) method which ensures that personnel have obtained qualifications commensurate with the performance requirements of their job. This training program ensures that candidates receive instruction in leadership skills, interpersonal communication, command responsibilities and limitations, motivation of personnel, problem analysis and decision making, and administrative policies and procedures. These skills are not discipline specific skills but are commensurate with their job responsibility as supervisors.

Turkey Point intends to implement multi-discipline work teams. The implementation of multi-discipline work teams results in a need for a supervisor who is capable of overseeing tasks from various disciplines. The MDS shall be the person in charge and the most accountable individual toward accomplishing quality and efficient work objectives in a multi-discipline work team. The purpose of the MDS is to oversee preventive, predictive, and corrective maintenance on plant mechanical, electrical, and instrument and control systems and components as required by TS, plant procedures, and NRC requirements.

Although there are qualification requirements for the single discipline supervisor in the ANSI standards, there are no specific qualification requirements defined for the MDS position. This proposed TS change is to delineate the qualification requirements for the MDS.

Turkey Point intends to implement a selection and qualification process for the MDS. Since qualification is defined in terms of education, experience and training, the proposed TS changes define the MDS qualification requirements in terms of education, experience and training. The MDS shall have a fundamental working knowledge of the tasks being performed as well as the broad knowledge of applicable station expectations, work practices, and industrial safety practices to ensure safety and procedural adherence is enforced at all times.

The selection process recognizes the responsibilities unique to the multi-discipline supervisory position. Specific criteria are established for the selection of the MDS candidate. These include education, experience, and technical competence. Additional selection criteria include supervisory qualities such as leadership, judgement, motivation, integrity, teamwork skills. An assessment of the candidates' supervisory experience and potential is conducted.

The MDS candidates must have a high school diploma or equivalent. This minimum educational requirement is the same for all single or multi-discipline supervisors.

In terms of experience, the MDS candidates must have a minimum of four years experience in one or more technical disciplines (maintenance, operations, engineering, or other related technical discipline). The four years of experience shall include three years of power plant experience, of which one year is at a nuclear power plant.

Some of the typical jobs to be supervised by an MDS include pump/motor overhauls, valve and actuator overhauls, reactor disassembly/reassembly, etc. These work activities contain many steps that are not discipline-specific. FPL believes that four years of experience in technical disciplines exposes personnel not only to the technical aspects of specific disciplines, but to fundamental principles that can be applied to maintenance activities. Therefore, four years experience in any related technical discipline or disciplines provides sufficient fundamental technical knowledge for proper maintenance supervisory oversight.

Once selected, the MDS candidates will receive additional training. A SAT based job and task analysis has been conducted for the MDS position and as a result a training program has been designed to address the additional identified needs. Fundamental working knowledge of tasks being performed is acquired by the MDS SAT program. The training concentrates on developing the skills and knowledge of an MDS to safely oversee tasks for multi-discipline work teams. The candidates obtain knowledge of work control processes since they need to have a perspective of both maintenance and plant operations, as well as an understanding of administrative procedures.

The MDS initial training program consists of three parts; classroom and laboratory training, mentoring and evaluation, and a final interview with maintenance management. The classroom/laboratory training includes print reading, troubleshooting, electrical safety, mechanical practices (alignments, pump/valve fundamentals), electrical practices (electrical components, test equipment, grounding), and control circuit maintenance.

After completing the classroom and laboratory training, the MDS will then temporarily work under the guidance of a mentor when the work assigned is outside of the discipline of expertise. The mentor will be assigned by maintenance management. This mentoring process is a part of the overall MDS training and it is required for the successful completion of initial training. Finally, interviews will be conducted by training and maintenance management to assure that each MDS candidate possesses the required skills and knowledge to supervise work tasks from other disciplines in order to be considered qualified to direct the activities of multi-discipline work teams.

The MDS will also attend continuing training. The lessons presented during continuing training are selected by training review committees and are based upon feedback of performance issues, operational experience, industry events and initiatives, procedure changes, and plant modifications, as well as SAT based selected topics.

The MDS position will have a qualification tracking process. A qualification matrix will list the initial and specialized task areas and the qualifications that each MDS possesses. This matrix will be used to ensure only qualified supervisors are assigned to oversee multi-discipline tasks. Control of proper supervision assignment will be through the use of the qualification matrix similar to the qualification matrix which is currently used for the craft.

In addition to the MDS training provided, the Maintenance department will establish specific administrative controls that govern multi-discipline work teams. These controls will focus on providing guidance for work assignments to qualified craft and supervisors. These administrative controls will provide defense-in-depth to ensure safe, and high quality maintenance work.

Description of Proposed Changes

The following changes, shown in Attachment 3, are proposed:

TS 6.3 Facility Staff Qualifications

Revise section 6.3.1 to identify all exceptions taken from ANSI-N18.1-1971 including the Multi-Discipline Supervisor (MDS) position as follows:

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for
 - 6.3.1.1 The Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975,
 - 6.3.1.2 The Operations Manager whose requirement for a Senior Reactor Operator License is as stated in Specification 6.2.2.i,
 - 6.3.1.3 The Licensed Operators and Senior Operators who shall also meet or exceed the minimum qualifications of the supplemental requirements specified in 10 CFR Part 55 and ANSI 3.1, 1981,
 - 6.3.1.4 The Multi-Discipline Supervisors who shall meet or exceed the following requirements:
 - a. Education: Minimum of a high school diploma or equivalent
 - b. Experience: Minimum of four years of related technical experience, which shall include three years power plant experience of which one year is at a nuclear power plant
 - c. Training: Complete the Multi-Discipline Supervisor training program

TS change Justification:

TS sections 6.3.1.1 through 6.3.1.3 were rewritten to clarify all the exceptions taken from the ANSI N18.1-1971 standards for the facility staff qualifications. Section 6.3.1.4 was added to specify qualification requirements for the MDS.

In the case of single discipline supervisors, the education and experience qualification requirements shall continue to be in accordance with the ANSI N18.1-1971 standards.

The proposed new TS Section 6.3.1.4, delineates the qualification requirements in the areas of education, experience, and training for the MDS since the functional level for such a position is different than that of a single discipline supervisor, and not specifically defined in any ANSI standard. INPO addresses the required experience for multi-discipline supervisors by stating that they need to have a fundamental working knowledge of tasks being performed. FPL will ensure that an MDS possesses this fundamental working knowledge by requiring that each MDS meets or exceeds the proposed TS MDS qualification requirements as defined herein.

TS Section 6.3.1.4.a: the proposed TS requirement for education is a high school diploma or equivalent. This is identical with the educational requirement identified in the ANSI standards for non licensed supervisors.

TS Section 6.3.1.4.b: the proposed TS requirement for experience requires a minimum of four years of related technical experience, which shall include three years power plant experience of which one year is at a Nuclear Power Plant.

Experience is one of the areas evaluated in order to assess their technical competence and to determine training needs for qualifying the candidates to the performance requirements of the job. The requirement for four years of related technical experience is based on a supervisor selection criteria that requires the MDS candidates to be proficient in one or more technical disciplines in order to be considered.

The four years of related technical experience exposes personnel to the general work principles common to maintenance disciplines such as work practices and management expectations, analytical ability, questioning attitude, collaboration and involvement among craft and facility staff, and conservative approach toward nuclear and industrial safety. These skills are needed by personnel in either a single or multi-discipline supervisory position. Since these and other soft skills are a common factor in every technical discipline, it is expected that such skills promote consistency in supervision independent of a discipline. Accordingly, related technical experience for four years provides sufficient insight on general principles needed for maintenance supervision.

The proposed TS requires that the four years of experience shall include three years of power plant experience, of which one year is at a nuclear power plant. This requirement is more restrictive than ANSI N18.1-1971 and is consistent with part of the experience requirement found in ANSI 3.1-1993.

Experience is supplemented with additional technical knowledge and skills required for job performance by the specific MDS training. Based on the job specific analysis conducted, the MDS training program ensures that a fundamental working knowledge of the tasks being performed is acquired by all Multi-Discipline Supervisors.

TS Section 3.6.1.4.c: the proposed requirement for training is to complete the Multi-Discipline Supervisor training program.

Initial and continuing MDS training ensure that personnel are qualified to perform the job requirements. The training process is based on a systematic approach to training and utilizes INPO Academy Standards.

The MDS initial training program is established to develop the skills and knowledge necessary to supervise multi-discipline work teams. The basic elements for establishing a systematic MDS training program include the following:

- a. The systematic analysis of the job to be performed. The MDS position is analyzed, and the skills and knowledge requirements of the tasks performed are determined to ensure competent job performance
- b. Establishment of prerequisite education, skills, and knowledge required for entry into the MDS training program
- c. Design and development of the MDS training program curriculum and associated lessons based on job performance requirements identified in the job analysis
- d. Implementation of the MDS training program to ensure knowledge and skills are obtained to meet job performance requirements
- e. Evaluation of the MDS candidate's ability to satisfy job performance requirements
- f. Evaluation and revision of the MDS training program to ensure program effectiveness is maintained.

The MDS initial training program also includes instruction in the following supervisory skills commensurate with their job responsibilities: leadership, interpersonal communication, command responsibilities and limitations, motivation of personnel, problem analysis, conservative decision making, and administrative policies and procedures.

MDS continuing training is implemented to maintain and enhance the proficiency of an MDS. The program is structured commensurate to the position needs and includes the following: significant plant system modifications, applicable procedure changes, industry events and initiatives, selected topics on plant fundamentals, and other training needed to address performance issues.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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 amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed changes are administrative in nature addressing personnel qualification issues. The Multi-Discipline Supervisor (MDS) position will be filled with personnel who are experienced in one or more technical disciplines (maintenance, operations, engineering, or other related technical discipline). Fundamental working knowledge of tasks being performed will be acquired through the MDS initial training program. The training concentrates on developing the skills and knowledge of an MDS to safely oversee tasks for multi-discipline work teams. Therefore, four years experience in any related technical discipline or disciplines combined with the MDS training program provide adequate technical knowledge for proper job oversight. These proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated because they 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 amendments 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 modes of plant operation defined in the facility operating license, or Technical Specifications that preserve safety analysis assumptions. These changes address qualification requirements for the MDS position. Since the proposed changes do not change the qualifications for those individuals responsible for the actual licensed operation of the facility, 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. No new failure mode is introduced due to the administrative changes since the proposed changes do not involve the addition or modification of equipment nor do they alter the design or operation of affected plant systems, structures, or components.

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

The operating limits and functional capabilities of the affected systems, structures, and components are unchanged by the proposed amendments. The proposed changes to add the MDS position have management and administrative controls associated with the required qualification requirements. The Turkey Point Technical Specifications will ensure that any individual filling the MDS position has the requisite education, experience, and training. As a result, operation of the facility in accordance with the proposed changes would not involve a significant reduction in a margin of safety.

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

L-98-170
Attachment 3

ATTACHMENT 3

PROPOSED LICENSE AMENDMENTS FOR
ADMINISTRATIVE CHANGES TO TECHNICAL SPECIFICATIONS

PROPOSED TECHNICAL SPECIFICATIONS PAGES

Section 6 page 6-5

