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L-2001-141  
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  
Corporate Officer Title Change

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 (TS) Section 6.0, "Administrative Controls." The purpose of these amendments is to change the title of the corporate executive responsible for overall plant nuclear safety from "President-Nuclear Division" to "Chief Nuclear Officer."

FPL has determined that the proposed license amendments do not involve a significant hazard pursuant to 10 CFR 50.92. A description of the amendments request and the Environmental Impact Evaluation is provided in Attachment 1. The No Significant Hazards Consideration Determination in support of the proposed TS changes are provided in Attachment 2. Enclosure 1 provides the marked up TS pages showing the changes.

The proposed license amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board. In accordance with 10 CFR 50.91(b)(1), a copy of the proposed license amendments is being forwarded to the State Designee for the State of Florida.

The Topical Quality Assurance Report was revised to reflect the organizational title change. The title change was determined not to reduce the FPL Quality Assurance Program commitments.

Should there be any questions, please contact Steve Franzone at 305-246-6228.

Very truly yours,

R. J. Hovey  
Vice President  
Turkey Point Plant

DRL

Attachments, Enclosure

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

M006  
A001



## ATTACHMENT 1

### DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

#### 1.0 Introduction

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 (TS) Section 6.0, "Administrative Controls." The purpose of these amendments is to revise TS Section 6.0 to reflect a corporate officer title change at FPL. The corporate officer responsible for overall plant nuclear safety, "President-Nuclear Division," will be changed to "Chief Nuclear Officer" to reflect this change at FPL.

#### 2.0 Background

On June 4, 2001, FPL appointed a Senior Vice President in charge of all nuclear operations. The Senior Vice President has corporate responsibility for overall plant nuclear safety and reports to the President and Chief Executive Officer of FPL Group. Previous to this, the corporate executive responsible for overall plant nuclear safety was designated as "President-Nuclear Division" in the Turkey Point Units 3 and 4 TS, Section 6.0.

The proposed change eliminates the specific reference to an organizational title, "President-Nuclear Division", and substitutes it with the generic organizational position title of "Chief Nuclear Officer." The Senior Vice President in charge of all nuclear operations will meet all the requirements of the title of "Chief Nuclear Officer" as delineated in the Turkey Point Units 3 and 4 TS, Section 6.0. FPL's Topical Quality Assurance Report (TQAR) has been changed, consistent with the requirements of 10 CFR 50.54 (a) (3), to substitute "President-Nuclear Division" with the generic organizational position title of "Chief Nuclear Officer." Use of the generic organizational position title of "Chief Nuclear Officer" in the TS will preclude the need for future amendments to the TS, should the title change for the corporate executive responsible for overall plant nuclear safety.

#### 3.0 Description and Justification of Proposed Change

The following changes as shown in Enclosure 1 are proposed:

1. Revise TS Section 6.2.1 b. to replace [President-Nuclear Division] with [Chief Nuclear Officer].
2. Revise TS Section 6.7.1 a. to replace [President-Nuclear Division] with [Chief Nuclear Officer].
3. Revise TS Section 6.7.1 c. to replace [President-Nuclear Division] with [Chief Nuclear Officer].

#### Justification:

The proposed changes are administrative in nature and create no change in responsibilities or accountabilities as defined in Section 6.0 of the Turkey Point TS. The Senior Vice President in charge of all nuclear operations will continue to be responsible for the overall plant nuclear safety and meet all other requirements of the "Chief Nuclear Officer" as used in Section 6.0 of the Turkey Point TS and the TQAR.

FPL's Senior Vice President in charge of all nuclear operations has overall responsibility for the Nuclear Division's activities including corporate responsibility for overall plant nuclear safety. Reporting to the Chief Nuclear Officer are: the Vice President - Turkey Point Plant, Vice President - St. Lucie Plant, Director Nuclear Assurance, Vice President Nuclear Engineering, Manager Nuclear Plant Support Services, and Manager Nuclear Financial and Information Services. The Senior Vice President will report to the President and Chief Executive Officer of FPL Group. Thus, the Senior Vice President will act as the "Chief Nuclear Officer" as used in the Turkey Point TS and the TQAR, with no changes in administrative responsibilities or accountabilities as described in Section 6.0 of the Turkey Point TS.

The proposed changes are consistent with the requirements of 10 CFR 50.36.

### **Environmental Consideration**

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not:

- (i) involve a significant hazards consideration,
- (ii) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and
- (iii) result in a significant increase in individual or cumulative occupational radiation exposure.

The proposed license amendments revise the Turkey Point Units 3 and 4 Facility Operating License to change the title of the corporate executive responsible for overall plant nuclear safety in the Turkey Point Units 3 and 4 TS, Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer." The proposed license amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendments involve no significant hazards consideration and meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). FPL has determined, pursuant to 10 CFR 51.22(b), that an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

## ATTACHMENT 2

### NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

#### Introduction

*Description of amendments request:* The purpose of these amendments is to change the title of the corporate executive responsible for overall plant nuclear safety in the Turkey Point Units 3 and 4 Technical Specifications (TS), Section 6.0, from "President-Nuclear Division" to "Chief Nuclear Officer." The proposed change eliminates the specific reference to an organizational title, "President-Nuclear Division," and substitutes it with the more generic organizational title of "Chief Nuclear Officer." Use of the more generic title of "Chief Nuclear Officer" in the TS will preclude the need for future amendments to the TS in response to corporate title changes for the executive responsible for overall plant nuclear safety.

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 are administrative in nature, changing the title of the corporate executive responsible for overall plant nuclear safety, and would not involve a significant increase in the probability or consequences of an accident previously evaluated. These amendments 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 TS 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 proposed changes to the TS are administrative in nature, changing the title of the corporate executive responsible for overall plant nuclear safety in the Turkey Point Units 3 and 4 TS, and would not create the possibility of a new or different kind of accident from any previously evaluated. The proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. 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 proposed changes are administrative in nature, changing the title of the corporate executive responsible for overall plant nuclear safety in the Turkey Point Units 3 and 4 TS, and would not reduce any of the margins of safety. The operating limits and functional capabilities of the affected systems, structures, and components remain unchanged by the proposed amendments.

**Conclusion**

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 change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

**ENCLOSURE 1**

**PROPOSED LICENSE AMENDMENT FOR  
CHANGE TO TECHNICAL SPECIFICATIONS**

**Technical Specification Page Changes**

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Page 6-12

## ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Plant General Manager shall be responsible for overall unit operation of both units and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Nuclear Plant Supervisor (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

### 6.2 ORGANIZATION

#### ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for facility operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to, and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).
- b. The ~~President-Nuclear Division~~ <sup>Chief Nuclear Officer</sup> shall have corporate responsibility for overall plant nuclear safety, and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The Plant General Manager shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
- e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the Health Physics Supervisor shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

## ADMINISTRATIVE CONTROLS

### 6.6 DELETED

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. In accordance with 10 CFR 50.72, the NRC Operations Center, shall be notified by telephone as soon as practical and in all cases within one hour after the violation has been determined. The ~~President-Nuclear Division~~ <sup>Chief Nuclear Officer</sup> and the Company Nuclear Review Board (CNRB) shall be notified within 24 hours.
- b. A Licensee Event Report shall be prepared in accordance with 10 CFR 50.73.
- c. The License Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to the CNRB, and the ~~President-Nuclear Division~~ <sup>Chief Nuclear Officer</sup> within 30 days after discovery of the event.
- d. Critical operation of the unit shall not be resumed until authorized by the Nuclear Regulatory Commission.