

April 28, 1988

Docket Nos. 50-250  
and 50-251

Mr. W. F. Conway  
Acting Group Vice President  
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Florida Power and Light Company  
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Dear Mr. Conway:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS RE: REMOVAL  
OF ORGANIZATIONAL CHARTS FROM THE TECHNICAL SPECIFICATIONS  
(TAC NOS. 67436 AND 67437)

The Commission has issued the enclosed Amendment No. 129 to Facility Operating License No. DPR-31 and Amendment No. 123 to Facility Operating License No. DPR-41 for the Turkey Point Plant, Units Nos. 3 and 4, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application transmitted by letter dated February 19, 1988, and supplemented on April 22, 1988.

These amendments replace the organization charts in the Technical Specifications with more general organizational requirements. These general requirements capture the essence of those organizational features depicted on the charts necessary for ensuring that the plant is operated safely. In addition, several other changes were made to Section 6. They include: changing references of "Vice President-Nuclear Operations" or "Group Vice President-Nuclear Energy" to "Senior Vice President-Nuclear" in six different places in the TS; clarification of "immediate" written notification to mean "within 24 hours" for a specific action identified; and finally, revision of the TS pertaining to the Company Nuclear Review Board (CNRB) to change one membership from "Chairman: Group Vice President - Nuclear Energy" to "Senior Vice President - Nuclear"; to change another membership from "Vice President - Nuclear Operations" to "Vice President - Nuclear Energy"; to change a third membership from "Senior Project Manager - Power Plant Engineering" to "Manager - Power Plant Engineering"; and to not require a vice-president to be the CNRB chairman.

In the supplement dated April 22, 1988, FPL withdrew their proposal to delete the requirement for the Operations Superintendent to be a licensed Senior Reactor Operator (SRO). This will be addressed under separate correspondence. FPL has indicated that a modified proposal will be submitted under separate cover in the near future. In a letter from the NRC to FPL dated January 15, 1988, discretionary enforcement to TS Section 6, Figure 6.2-2, was granted to allow Mr. Pearce to serve as Operations Superintendent until he receives a current Turkey Point SRO license or until the TS are changed to delete this requirement. These amendments transfer the discretionary enforcement from Figure 6.2-2 (which has now been deleted) to Section 6.2.2 of the TS.

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April 28, 1988

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Mr. W. F. Conway  
Florida Power and Light Company

Turkey Point Plant

cc:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

FLORIDA POWER AND LIGHT COMPANY  
DOCKET NO. 50-250  
TURKEY POINT PLANT UNIT NO. 3  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 129  
License No. DPR-31

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power and Light Company (the licensee) dated February 19, 1988, as supplemented April 22, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:

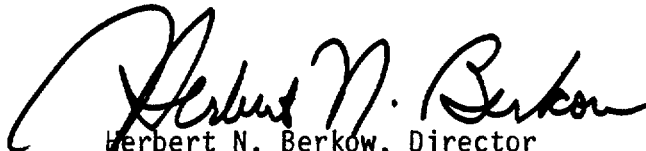
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PDR ADOCK 05000250  
P PDR

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 129, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects-I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 28, 1988



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 123  
License No. DPR-41

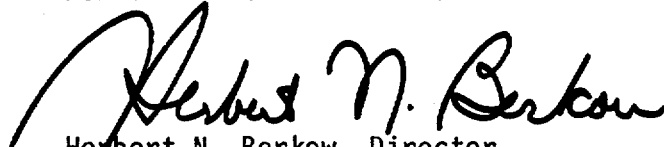
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power and Light Company (the licensee) dated February 19, 1988, as supplemented April 22, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-41 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 123, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, reading "Herbert N. Berkow". The signature is fluid and cursive, with the first name "Herbert" being more prominent and the last name "Berkow" following in a similar style.

Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects-I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 28, 1988

**ATTACHMENT TO LICENSE AMENDMENT**

**AMENDMENT NO. 129      FACILITY OPERATING LICENSE NO. DPR-31**

**AMENDMENT NO. 123      FACILITY OPERATING LICENSE NO. DPR-41**

Revise Appendix A as follows:

**Remove Pages**

vi  
6-1  
-  
Figure 6.2-1  
Figure 6.2.-2  
Table 6.2-1  
6-5  
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6-8  
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**Insert Pages**

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6-1  
6-1a  
6-2  
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6-14



## LIST OF FIGURES

<u>Figure</u>	<u>Title</u>
2.1-1	Reactor Core Thermal and Hydraulic Safety Limits, Three Loop Operation
2.1-1a	Deleted
2.1-1b	Deleted
2.1-2	Reactor Core Thermal and Hydraulic Safety Limits, Two Loop Operation
3.1-1	DOSE EQUIVALENT I-131 Primary Coolant Specific Activity Limit Versus Percent of RATED POWER with the Primary Coolant Specific Activity > 1.0 $\mu\text{Ci}/\text{gram}$ Dose Equivalent I-131
3.1-1a	Reactor Coolant System Heatup and Cooldown Pressure Limits
3.1-1b	Reactor Coolant System Heatup and Cooldown Pressure Limits
3.1-1c	Reactor Coolant System Heatup and Cooldown Pressure Limits
3.1-1d	Reactor Coolant System Heatup and Cooldown Pressure Limits
3.1-2	Radiation Induced Increase in Transition Temperature for A302-B Steel
3.1-2c	Radiation Induced Increase in Transition Temperature for A302-B Steel
3.1-2d	Radiation Induced Increase in Transition Temperature for A302-B Steel
3.2-1	Control Group Insertion Limits for Unit 4, Three Loop Operation
3.2-1a	Control Group Insertion Limits for Unit 4, Two Loop Operation
3.2-1b	Control Group Insertion Limits for Unit 3, Three Loop Operation
3.2-1c	Control Group Insertion Limits for Unit 3, Two Loop Operation
3.2-2	Required Shutdown Margin
3.2-3	K (z) vs Core Height
3.2-3a	Deleted
3.2-4	Maximum Allowable Local KW/FT
4.12-1	Sampling Locations
5.1-1	FPL Turkey Point Site Area Map
6.2-1	Deleted
6.2-2	Deleted
B3.1-1	Effect of Fluence and Copper Content on Shift of RTNDT for Reactor Vessel Steels Exposed to 550 F Temperature
B3.1-2	Fast Neutron Fluence ( $E > 1\text{MEV}$ ) as a function of Effective Full Power Years
B3.2-1	Target Band on Indicated Flux Difference as a Function of Operating Power Level
B3.2-2	Permissible Operating Band on Indicated Flux Difference as a Function of Burnup (Typical)

**6.0 ADMINISTRATIVE CONTROLS**

**6.1 RESPONSIBILITY**

- 6.1.1** The Plant Manager-Nuclear shall be responsible for overall licensed facility operation and shall delegate in writing the succession to this responsibility during his absence.

**6.2 ORGANIZATION**

**6.2.1 ONSITE AND OFFSITE ORGANIZATION**

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 Senior Vice President-Nuclear shall be responsible 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 Manager-Nuclear shall be responsible for overall unit 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 manager 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.

**6.2.2****FACILITY STAFF**

The Facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor;
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trip;

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION #

LICENSE CATEGORY QUALIFICATIONS	ONE OR TWO UNITS OPERATING <sup>A</sup>	ALL UNITS SHUTDOWN
SRO*	2	1**
RO	3	2
Non-Licensed Auxiliary Operators	3	3
Shift Technical Advisor	1+	None Required

+ This position may be filled by one of the SROs above, provided the individual meets the qualification requirements of 6.3.1.

\* Includes the licensed Senior Reactor Operator serving as Shift Supervisor.

\*\* Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising the movement of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel.

A Operating is defined as  $K_{eff} \geq 0.99$ , % thermal power excluding decay heat greater than or equal to zero, and an average coolant temperature  $T_{avg} \geq 200$  F.

# Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

- d. An individual qualified in radiation protection procedures shall be on-site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A site Fire Brigade of at least 5 members shall be maintained on-site at all times\*. The Fire Brigade shall not include 2 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- g. The Operations Supervisor shall hold a Senior Reactor Operator License.
- h. The Operations Superintendent shall hold a Senior Reactor Operator License.

### **6.3 FACILITY STAFF QUALIFICATIONS**

**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 the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

#### **6.3.2 Health Physics Supervisor Qualifications**

**6.3.2.1** The Health Physics Supervisor at the time of appointment to the position, shall, except as indicated below, meet the following:

- 1. He shall have a bachelor's degree or equivalent in a science or engineering subject, including some formal training in radiation protection.
- 2. He shall have five years of professional experience in applied radiation protection; where a master's degree in a related field is equivalent to one year experience and a doctor's degree in a related field is equivalent to two years of experience.
- 3. Of his five years of experience, three years shall be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered at Turkey Point Plant.

**6.3.2.2** When the Health Physics Supervisor does not meet the above requirements, compensatory action shall be taken which the Plant Nuclear Safety Committee determines and the NRC Office of Nuclear Reactor Regulation concurs that the action meets the intent of Specification 6.3.2.1.

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\* Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

**6.5.1.5 QUORUM**

A quorum of the PNSC shall consist of the Chairman or Vice Chairman and four (4) members including alternates.

**6.5.1.6 RESPONSIBILITIES**

The Plant Nuclear Safety Committee shall be responsible for:

- a. Review of 1) all procedures and changes thereto required by Section 6.8 and 2) any other proposed procedures or changes thereto as determined by the Plant Manager-Nuclear to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications in Appendix A of the license.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications and preparation and forwarding a report covering evaluation and recommendations to prevent recurrence to the Senior Vice President-Nuclear and to the Chairman of the Company Nuclear Review Board.

- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Company Nuclear Review Board.
- h. Review of the Plant Security Plan and implementing procedures and submitting recommended changes to the Chairman of the Company Nuclear Review Board.
- i. Review of the Emergency Plan and implementing procedures and submitting recommended changes to the Chairman of the Company Nuclear Review Board.
- j. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.
- k. Review of all REPORTABLE EVENTS.

#### **6.5.1.7      AUTHORITY**

The Plant Nuclear Safety Committee shall:

- a. Recommend to the Plant Manager-Nuclear written approval or disapproval (in minutes of PNSC meeting) of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing (in minutes of PNSC meetings) with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide 24 hour written notification to the Senior Vice President-Nuclear and the Company Nuclear Review Board of disagreement between the PNSC and the Plant Manager-Nuclear; however, the Plant Manager-Nuclear shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

#### **6.5.1.8      RECORDS**

The Plant Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President-Nuclear and Chairman of the Company Nuclear Review Board.

## **6.5.2 COMPANY NUCLEAR REVIEW BOARD (CNRB)**

### **6.5.2.1 FUNCTION**

The Company Nuclear Review Board shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations.
- b. Nuclear engineering.
- c. Chemistry and radiochemistry.
- d. Metallurgy.
- e. Instrumentation and control.
- f. Radiological safety.
- g. Mechanical and electrical engineering.
- h. Quality assurance practices.

### **6.5.2.2 COMPOSITION**

The CNRB shall be composed of the following members:

1. Member: Senior Vice President-Nuclear
2. Member: Vice President-Nuclear Energy
3. Member: Vice President-Engineering, Project Management, and Construction
4. Member: Chief Engineer-Power Plant Engineering
5. Member: Director-Nuclear Licensing
6. Member: Director-Quality Assurance
7. Member: Manager-Nuclear Energy Services
8. Member: Manager-Nuclear Fuel
9. Member: Manager-Power Plant Engineering
10. Member: Group Vice President

The Chairman shall be a Member of the CNRB and shall be designated in writing.



## **6.6 REPORTABLE EVENT ACTION**

### **6.6.1** The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PNSC, and the results of this review shall be submitted to the CNRB, and the Senior Vice President-Nuclear.

## **6.7 SAFETY LIMIT VIOLATION**

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

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported immediately to the Commission, the Senior Vice President-Nuclear and to the CNRB.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PNSC. This report shall describe 1) applicable circumstances preceding the violation, 2) effects of the violation upon facility components, systems or structures, and 3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the CNRB, the Senior Vice President-Nuclear and the Commission within ten (10) days of the violation.

## **6.8 PROCEDURES**

- 6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972, Appendix "A" of USNRC Regulatory Guide 1.33, PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, Quality Control Program for effluent monitoring using the guidance in Regulatory Guide 1.21, Revision 1, June 1974, Quality Control Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975, and the Facility Fire Protection Program except as provided in 6.8.2 and 6.8.3 below.

Figure 6.2-1 was intentionally deleted

Figure 6.2-2 was intentionally deleted



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 129 TO FACILITY OPERATING LICENSE NO. DPR-31  
AND AMENDMENT NO. 123 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated February 19, 1988, as supplemented April 22, 1988, Florida Power & Light Company (FP&L, the licensee) submitted a request for changes to Section 6, Administrative Controls, of the Turkey Point Nuclear Power Plant, Units 3 and 4, Technical Specifications (TS). The first proposed change would replace the organization charts currently in the TS with more general organizational requirements. Most of these elements are already required by regulation, other TS or the Final Safety Analysis Report, as described below. These general requirements capture the essence of those organizational features depicted on the charts that are important to the NRC for ensuring that the plant will be operated safely. In addition, FP&L proposed to make several other changes to Section 6. These include: changing references of "Vice President-Nuclear Operations" or "Group Vice President-Nuclear Energy" to "Senior Vice President-Nuclear" in six different places in the TS; clarification of "immediate" written notification to mean "within 24 hours" for a specific action identified; and finally, revision of the TS pertaining to the Company Nuclear Review Board (CNRB) to change one membership from "Chairman: Group Vice President-Nuclear Energy" to "Senior Vice President-Nuclear"; to change another membership from "Vice President-Nuclear Operations" to "Vice President-Nuclear Energy"; to change a third membership from "Senior Project Manager-Power Plant Engineering" to "Manager-Power Plant Engineering"; and to not require a vice-president to be the CNRB chairman.

Because the first proposed change (deletion of organization charts from TS) is the most significant of those in the amendment request, the next several pages of this Safety Evaluation are devoted to an evaluation of this issue, with a discussion of applicable regulatory requirements, past practice, and safety considerations. The remaining TS changes proposed by FP&L are then evaluated.

On March 22, 1988, subsequent to the licensee's application, the staff issued Generic Letter 88-06 entitled "Removal of Organization charts from Technical Specification Administrative Control Requirements." The staff used the Generic Letter as guidance in reviewing the licensee's proposed changes.

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## 2.0 EVALUATION

Section 6.0 of the licensee's TS is required to contain the details of those administrative controls necessary to assure safe operation of the facility. For the first change, FP&L proposed to replace Turkey Point TS 6.2.1, TS Figure 6.2-1 (the figure showing the offsite organization), and TS Figure 6.2-2 (the figure showing the unit onsite organization) with more general organizational requirements. These general requirements capture the essence of those organizational features depicted on the charts that are important to the NRC for ensuring that the plant will be operated safely.

FP&L stated that the proposed changes are justified because they are administrative in nature and do not affect plant operation. FP&L notes that, in addition to being required by the TS, the important organizational features depicted on the organization charts are also required or controlled by other regulatory control mechanisms. For example, FP&L's Quality Assurance (QA) Program for Turkey Point is required by 10 CFR 50, Appendix B, to include similar information relating to the organizational structure.

The licensee contends that changes to these charts have resulted in processing unnecessary amendments by both the Company and the NRC. The licensee has stated that deletion of the organization charts will, therefore, eliminate needless expenditure of resources for both organizations.

### Regulatory Requirements Applicable to Organizational Structure

10 CFR 50.36, "Technical Specifications," which implements Section 182a of the Atomic Energy Act, was promulgated by the Commission on December 17, 1968 (33 FR 18610). This rule delineates requirements for determining the contents of the TS. Technical Specifications set forth the specific characteristics of the facility and the conditions for its operation that are required to provide adequate protection to the health and safety of the public. Specifically, 10 CFR 50.36 requires that:

Each license authorizing operation of a production or utilization facility of a type described in §50.21 or §50.22 will include Technical Specifications. The Technical Specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to 50.34. The Commission may include such additional TS as the Commission finds appropriate.

The regulation further states that the TS will include, among other things, items in the following category:

(5) Administrative Controls: Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. Each licensee shall submit any reports to the Commission pursuant to approved Technical Specifications as specified in §50.4.

### Past Practice

Review of the organization, personnel qualifications, education, experience, training, and their overall capacity to operate a plant safely has always been of concern to the NRC, and its predecessor, the AEC. Before a plant is licensed to operate, a finding is made that the applicant's staff is capable of operating the plant safely. In the past, the organization charts were made TS so that changes made after operation began would require prior NRC approval. This was done to preserve certain specific features of the licensed organization.

While the regulation does not specifically require that the TS contain organization charts, the practice of including organization charts in the TS began in the late 1960s. These charts were used as an aid in depicting the organizational and management relationships thought to be needed to meet the provisions of 10 CFR 50.36(c)(5). The practice of including organization charts in the TS has continued since.

Organization charts do depict the reporting chain for some organizational functions that must be independent of scheduling and operating pressures. Until 10 CFR Part 50, Appendix B, - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," was adopted in 1970, organization charts were partially relied on by the staff for assuring this function.

As stated in 10 CFR 50, Appendix B, Criterion I, "Organization":

Such persons and organizations performing quality assurance functions shall report to a management level such that this required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided.

Appendix B further acknowledges that the organizational structures may take many forms, but emphasizes that regardless of structure, the individuals assigned the responsibility for execution of any portion of the program shall have access to such levels of management as may be necessary to perform this function. The licensee's required QA Program specifies and depicts these organizational relationships in greater detail than currently exists in the TS.

The practice of including organization charts in the TS was established before the advent of 10 CFR 50, Appendix B, - "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants," and other associated guidance documents, such as the Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," and NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants-LWR Edition." A general description of the features needed by the staff to make the finding that the applicant is capable of operating the plant safely is now mandated by Appendix B.

### Safety Considerations

The fundamental safety issue in the proposal to delete organization charts from the TS is whether there can be reasonable assurance that the organization will operate the plant safely and remain effective without requiring prior staff approval for changes reflected in organization charts.

It has been the staff's experience that organization charts by themselves have been little help to reviewers in assessing the safety significance of changes to the plant and license. Nevertheless, because the charts are in the TS, license amendment requests have been required to effect organizational changes as simple as combining some minor functions under one organizational element shown on the chart. The usefulness of the charts to the staff in recent years has been minimal and the safety relevance of the charts themselves is small.

Specific operational requirements that bear more directly on the safety matters of concern to the staff than the organization charts are required elsewhere in TS. For example, the organizational element responsible for the control room command function is identified separately in the TS, as are the requirements for minimum staffing under various operating modes. The organizational management functions for independent reviews and audits, unit review group and independent safety engineering groups, and shift technical advisor are also specified in other TS. Thus, the organization charts themselves are not needed to support the staff's finding that the organization will operate the plant safely.

In summary, the specific details of the operating organization are not essential to the safe operation of the facility, and the staff concludes that the details can be modified in many ways while maintaining adequate operational safety. Over the years of experience with the details of operating organizations, the staff has been able to distill those organizational characteristics which are important to assure plant safety.

The important features of a licensee's organization (currently depicted on the TS organization charts, but not already included in other TS) necessary for the staff to find that the organization will operate the plant safely are stated below. These amendments revise the TS to add statements incorporating these features to replace the organization charts.

- a. Lines of authority, responsibility and communications 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, functional descriptions of departmental responsibilities and relationships and job descriptions for key personnel positions, or in equivalent forms of documentation. These organizational relationships will be maintained in a document such as the FSAR or QA Manual.
- b. There shall be an individual executive position (corporate officer) in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant so that continued nuclear safety is assured.
- c. There shall be an individual management position in the onsite organization having responsibilities for overall unit safe operation which shall have control over those onsite resources necessary for safe operation and maintenance of the plant.

- d. Although the individuals who train the operating staff and those who carry out the health physics and quality assurance functions may report to the appropriate manager on site, they shall have sufficient organizational freedom to be independent from operating pressures.
- e. Senior Reactor Operator (SRO) and Reactor Operator (RO) licenses shall continue to be required for the positions so indicated on the current TS organization charts.
- f. Other TS which reference the current organization charts shall be revised to reference the appropriate functional responsibility or position.

The proposed changes incorporate these features. Therefore, the staff concludes that the removal of the organization charts from the TS will not prevent the licensee from meeting the standards of 10 CFR 50.36 and the underlying statutory requirements. Moreover, the deletion of unnecessary detail of organization charts will save resources for both the NRC and the licensee and will allow the staff to focus on issues of importance to the plant's safety.

The licensee proposed to delete reference to the titles "Vice President-Nuclear Operations" and "Group Vice President-Nuclear Energy" in six different places in the TS and replace them with a reference to "Senior Vice President-Nuclear." This change would give the licensee more flexibility in changing management position titles without requiring a license amendment. The NRC staff believes that a specific person in the licensee's organization at the Vice President level should carry the responsibility, and that it must be clear who it is. The staff believes that the Senior Vice President-Nuclear is an appropriate person for this position, and the licensee's proposal is acceptable.

In the February 19, 1988 application, the licensee initially proposed to identify the management officers by general terminology. However, after discussions with the NRC staff, the licensee by letter dated April 22, 1988 modified the request to identify the Senior Vice President-Nuclear and the Plant Manager-Nuclear by their titles in accordance with the recommendations of GL 88-06. This change merely adds clarity to the more general terminology used in the February 19, 1988 request and does not affect the substance of the amendments as noticed nor the staff's proposed no significant hazards consideration determination.

The licensee proposed three title changes to the membership of the CNRB. The licensee believes that there will be no changes in collective talents on the CNRB and that the quality and scope of independent review will be maintained. The titles need to be changed because of an upcoming offsite organizational change. The title "Group Vice President-Nuclear Energy" will be changed to "Senior Vice President-Nuclear." The person occupying this position will also change. The title "Vice President-Nuclear Operations" will be changed to "Vice President-Nuclear Energy." The person occupying this position will not change. The title "Senior Project Manager-Power Plant Engineering" will be deleted, and the title "Manager-Power Plant Engineering" will be added. This will still require a senior person from Power Plant Engineering to be a member of the CNRB. The staff agrees that the collective talents on the CNRB will not be changed and that the quality and scope of independent review will be maintained. Therefore, the changes are acceptable.



The licensee also proposed to permit the Chairman of the CNRB to be any member of the CNRB, instead of the "Senior Vice President-Nuclear" (new title). In addition, the licensee proposed that the Chairman be designated in writing and need not be a vice president. The CNRB's function is to provide independent review and audit of designated activities in support of safely operating the nuclear power plants. The staff's objective is to have a Chairman of the group who is responsible for the activities of the group. The same person does not have to be Chairman continuously, as is now the requirement in the Turkey Point TS. The staff has no objections to having the Chairman position rotate as long as there is a Chairman who is responsible and it is clearly in writing who it is at any given time. On this basis, the licensee's proposed changes to the Chairman of the CNRB are acceptable.

Presently, the Plant Nuclear Safety Committee is required to provide "immediate" written notification to the Vice President of Nuclear Operations and the CNRB of disagreement between the Committee and the Plant Manager-Nuclear. The licensee is requesting to clarify the term "immediate" to mean "twenty-four hours." The licensee states that this will allow time for a written report to be prepared and is consistent with industry practice. A strict definition of immediate could lead one to think in terms of minutes; however, there is no accident or imminent safety problem present which would lead one to such a level of urgency. The staff has been sympathetic with licensees in recent years to allow them a reasonable period of time to prepare the document of disagreement. The staff has allowed twenty-four hours of time to deliver the disagreement document, and there has been no significant decrease in plant safety as a result. The licensee's request for twenty-four hours is consistent with recent staff practice, and is therefore, acceptable.

### 3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in recordkeeping, or administrative procedure or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant hazards considerations and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

### 4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: April 28, 1988

Principal Contributor:

G. E. Edison