October 12, 2015

L-2015-234

10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Re: Turkey Point Nuclear Plant, Units 3 and 4
Docket Nos. 50-250 and 50-251

License Amendment Request 244, Request to Revise the Technical Specifications Regarding Facility Staff Qualifications for Licensed Operators

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) hereby requests a license amendment to revise the technical specifications (TS) for Turkey Point Units 3 and 4. The proposed change revises the qualification requirements for licensed operators in TS 6.3, Facility Staff Qualifications, to require compliance only with the requirements of 10 CFR 55, Operators' Licenses.

The Enclosure to this letter provides FPL's evaluation of the proposed change. Attachment 1 to the enclosure provides a markup of the TS showing the proposed change, and the retyped TS page containing the proposed change is included in Attachment 2.

As discussed in the evaluation, the proposed change does not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change.

The Turkey Point Plant Nuclear Safety Committee has reviewed the proposed license amendment. In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designee of the State of Florida.

There are no new commitments made in this submittal.

FPL requests approval of this amendment request by October 30, 2016 and implementation within 90 days.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Licensing Manager, at 305-246-6698.

Florida Power & Light Company
9760 S.W. 344th Street Homestead, FL 33035

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2015.

Sincerely,

Thomas Summers

Site Vice President
Turkey Point Nuclear Plant

Enclosure

cc: NRC Regional Administrator, Region II
NRC Senior Resident Inspector
NRC Project Manager
Ms. Cindy Becker, Florida Department of Health

ENCLOSURE

Evaluation of the Proposed Change

SUBJECT: License Amendment Request 244, Request to Revise the Technical Specifications Regarding Facility Staff Qualifications for Licensed Operators

.....

Attachment 1 - Markup of Technical Specification Page

Attachment 2 - Clean Revised Technical Specification Page

1.0 SUMMARY DESCRIPTION

Turkey Point Units 3 and 4 Technical Specification (TS) 6.3 provides the requirements for qualifications of facility staff members. The TS currently requires that licensed operators meet the requirements specified in 10 CFR Part 55 and ANSI 3.1, 1981, in addition to the requirements in ANSI N18.1-1971. The proposed change revises the qualification requirements for licensed operators in TS 6.3, Facility Staff Qualifications, by removing the reference to ANSI 3.1 and requiring compliance only with 10 CFR 55, Operator's Licenses.

2.0 DETAILED DESCRIPTION

The proposed change to TS 6.3 is shown below:

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

6.3.1.1 .....

6.3.1.2 .....

6.3.1.3 The licensed ~~O~~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~~ *comply only with the requirements of 10 CFR 55.*

3.0 TECHNICAL EVALUATION

The proposed amendment revises the education and experience requirements for an applicant for an operator's license to stipulate that licensed operators shall comply only with 10 CFR 55. In accordance with 10 CFR 55.31, an applicant for an operator's license must provide evidence that the applicant has successfully completed the facility licensee's requirements to be licensed as an operator or senior operator to perform assigned duties. This certification must include the details of the applicant's qualifications, and details on courses of instruction administered by the facility licensee, and describe the nature of the training received at the facility, and the startup and shutdown experience received. In lieu of these details, the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training (SAT) and that uses a simulation facility acceptable to the Commission under 10 CFR 55.45(b),

On March 20, 1985, the NRC issued a "Commission Policy Statement on Training and Qualifications of Nuclear Power Plant Personnel" (50 FR 11147) [Reference 1]. The policy statement provided guidance on qualification programs and on a systems approach to training at commercial nuclear power plants. The policy statement also "endorses the INPO-managed Training Accreditation Program in that it encompasses the elements of performance-based training and will provide the basis to ensure that personnel have qualifications commensurate with the performance requirements of their

jobs." Subsequently, Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," [Reference 2] and NUREG 1262, "Answers to Questions Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," [Reference 3] indicated that the NRC would accept a licensed operator training program that is accredited and based on a systems approach to training (SAT).

The NRC revised its regulations related to operators' licenses in 1987. In conjunction with the rule change, the NRC issued Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, [Reference 4] which provided guidance on acceptable methods of meeting the regulations. RG 1.8 endorsed ANSI/ANS-3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants," with clarifications, additions, and exceptions; and ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." However, the NRC staff had reviewed the industry's licensed operator training program experience guidelines in effect at the time of the 1987 rule change and determined that they were equivalent to the baseline experience criteria of RG 1.8, Revision 2. Therefore, as discussed in the statements of consideration for the rule change, a licensee's training program would be considered approved by being accredited by the National Nuclear Accrediting Board (NNAB).

The licensed operator training program at Turkey Point is SAT-based and is accredited by the NNAB. 10 CFR 55.31(a)(4) allows the NRC to accept an application for an operator's license if the facility licensee certifies that the applicant has successfully completed a Commission-approved training program that is SAT-based in lieu of providing details of the applicant's education and experience. Therefore, the proposed change meets the requirements of 10 CFR 55.31(a)(4) to apply for an operator's license and ensures that FPL maintains administrative controls that assure operation of the facility in a safe manner by properly qualified licensed operators.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

- ***10 CFR 55, Operators' Licenses, Subpart D*** - allows the NRC to accept certification that the applicant has successfully completed a Commission-approved training program that is based on the SAT process, when an applicant applies for an operator's license.
- ***10 CFR 55.4, Definitions*** - defines systems approach to training as including the following five elements:
    1) Systematic analysis of the jobs to be performed.
    2) Learning objectives derived from the analysis which describe desired performance after training.
    3) Training design and implementation based on the learning objectives.
    4) Evaluation of trainee mastery of the objectives during training.
    5) Evaluation and revision of the training based on the performance of trained personnel in the job setting.

- ***Final Rule Regarding Operators' Licenses and Conforming Amendments (52FR09453)*** - statement of considerations discusses that subject to continued Commission endorsement of the industry's accreditation process under the Final Policy Statement on Training and Qualification of Nuclear Power Plant Personnel, a facility licensee's training program would be approved by being accredited by the National Nuclear Accrediting Board.
- ***NUREG-1021, Operator Licensing Examination Standards for Power Reactors*** - discusses that RG1.8 (Revision 2 or 3) and the guidelines for education and experience issued by the National Academy for Nuclear Training (NANT) outline acceptable methods for implementing the Commission's regulations.
- ***Regulatory Issue Summary 2001-01, Eligibility of Operator License Applicants*** - clarifies that a applicant for an operator's license has successfully completed a Commission-approved, systems approach to training based training program by meeting the minimum education and experience requirements outlined by the NANT, and by extension, Revision 3 of RG 1.8.

4.2 Precedent

In June 2013, the NRC issued license amendments to the Exelon plants [Reference 5] similar to Turkey Point's request. The amendments replaced the existing operator license applicant education and experience requirements with the requirement that licensed operators shall comply with 10 CFR 55.

- Amendment No. 173 and Amendment No. 173 for the Braidwood Station, Units 1 and 2, respectively,
- Amendment No. 180 and Amendment No. 180 for the Byron Station, Unit Nos. 1 and 2, respectively,
- Amendment No. 200 for the Clinton Power Station, Unit No. 1,
- Amendment No. 240 and Amendment No. 233 for Dresden Nuclear Power Station, Units 2 and 3, respectively,
- Amendment No. 206 and Amendment No. 193 for the LaSalle County Station, Units 1 and 2, respectively,
- Amendment No. 210 and Amendment No. 171 for the Limerick Generating Station, Units 1 and 2, respectively,
- Amendment No. 281 for the Oyster Creek Nuclear Generating Station,
- Amendment No. 289 and Amendment No. 292 for the Peach Bottom Atomic Power Station, Units 2 and 3, respectively,
- Amendment No. 251 and Amendment No. 246 for the Quad Cities Nuclear Power Station, Units 1 and 2, respectively,
- Amendment No. 280 for the Three Mile Island Nuclear Station, Unit 1.

Similarly, the Duke Energy plants received license amendments [Reference 6] in February 2015 that revised the TS to add a section indicating that licensed operator education and experience qualifications will meet or exceed the guidelines outlined by the NANT.

- Amendment No. 273 and Amendment No. 269 for Catawba 1 and 2,
- Amendment No. 276 and Amendment No. 256 for McGuire 1 and 2,
- Amendment No. 389, Amendment No. 391, and Amendment No. 390 for Oconee 1, 2 and 3.

4.3 Significant Hazards Consideration

The proposed change revises the qualification requirements for licensed operators in Technical Specification (TS) 6.3, Facility Staff Qualifications, by removing the reference to ANSI 3.1, 1981, and requiring compliance only with 10 CFR 55, Operator's Licenses. As required by 10 CFR 50.91(a), Florida Power & Light Company has evaluated the proposed changes to the Turkey Point TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The proposed change is of an administrative nature and does not impact the physical configuration or function of plant structures, systems, or components (SSCs) or the manner in which SSCs are operated, maintained, modified, tested, or inspected. No actual facility equipment or accident analyses are affected by the proposed changes. Although licensed operator qualifications and training may have an indirect impact on accidents previously evaluated, the proposed change does not reduce any operator qualification or training requirements.

   Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed). The proposed change does not create any new failure modes for existing equipment or any new limiting single failures. Additionally, the proposed change does not involve a change in the methods governing normal plant operation and all safety functions will continue to perform as previously assumed in

accident analyses. Thus, the proposed change does not adversely affect the design function or operation of any SSCs important to safety.

No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The proposed change does not challenge the performance or integrity of any safety-related system.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The margin of safety associated with the acceptance criteria of any accident is unchanged. The proposed change will have no effect on the availability, operability, or performance of safety-related systems and components. The proposed change will not adversely affect the operation of plant equipment or the function of equipment assumed in the accident analysis.

The proposed change does not change or lessen the qualification requirements for licensed operators. One purpose of the 1987 rule change (Operators' Licenses and Conforming Amendments) was to improve the safety of nuclear power plant operations by improving the operator licensing process and examination content. The NRC reviewed the licensed operator training program experience guidelines in effect at the time of the 1987 rule change and determined that they were equivalent to the baseline experience criteria of Regulatory Guide 1.8, Revision 2, which was issued in conjunction with the rule change. The proposed change maintains licensed operator training and qualification requirements consistent with 10 CFR 55 and ensures properly qualified licensed operators operate the facility.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based upon the above analysis, FPL concludes that the proposed amendment does not involve a significant hazards consideration, under the standards set forth in 10 CFR 50.92(c), "Issuance of Amendment," and accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATIONS

The proposed amendment changes recordkeeping, reporting, or administrative procedures or requirements. The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFRENCES

1. "Final Policy Statement on Training and Qualification of Nuclear Power Plant Personnel" (50 FR 11147), March 20, 1985
2. Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments (Generic Letter No. 87-07)," March 19, 1987
3. NUREG-1262, Answers to Questions at Public Meeting Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses, November 1987
4. Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, April 1987
5. NRC letter "BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CLINTON POWER STATION, UNIT NO.1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1 -ISSUANCE OF AMENDMENTS RE: STAFF QUALIFICATIONS EDUCATION AND EXPERIENCE ELIGIBILITY REQUIREMENTS FOR LICENSED OPERATORS (TAC NOS. ME9047, ME9048, ME9049, ME9050, ME9051, ME9052, ME9053, ME9054, ME9055, ME9056, ME9057, ME9058, ME9059,ME9060, ME9061, ME9062 AND ME9063)," June 20, 2013
6. NRC letter "CATAWBA NUCLEAR STATION, UNITS 1 AND *2* (CATAWBA 1 AND 2), MCGUIRE NUCLEAR STATION, UNITS 1 AND *2* (MCGUIRE 1 AND 2), AND OCONEE NUCLEAR STATION, UNITS 1, *2,* AND 3 (OCONEE 1, *2,* AND 3) -ISSUANCE OF AMENDMENTS REGARDING CHANGES TO ORGANIZATION, UNIT STAFF RESPONSIBILITY, UNIT STAFF QUALIFICATIONS, PROGRAMS AND MANUALS, AND HIGH RADIATION AREAS (TAC NOS. MF4491, MF4492, MF4493, MF4494, MF4495, MF4496, AND MF4497)," February 12, 2015

Attachment 1

Markup of Technical Specification Page

6.2.3 SHIFT TECHNICAL ADVISOR FUNCTION

6.2.3.1 An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit and the opposite unit. This individual shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift.

6.3 FACILITY STAFF QUALIFICATIONS

comply only with the requirements of 10 CFR 55.

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.

operators,

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

6.3.2 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 6.3.1.

6.3.3 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of 6.3.1.3, perform the functions described in 10 CFR 50.54(m)

6.4 DELETED

6.5 DELETED

6.6 DELETED

6.7 DELETED

Attachment 2

Clean Revised Technical Specification Page

6.2.3 SHIFT TECHNICAL ADVISOR FUNCTION

6.2.3.1 An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit and the opposite unit. This individual shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift.

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

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, who shall comply only with the requirements of 10CFR 55.

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

6.3.2 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 6.3.1.

6.3.3 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of 6.3.1.3, perform the functions described in 10 CFR 50.54(m)

6.4 DELETED

6.5 DELETED

6.6 DELETED

6.7 DELETED