ATTACHMENT 2

PROPOSED REVISED TECHNICAL SPECIFICATION PAGES

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ATTACHMENT TO LICENSE AMENDMENT

TURKEY POINT UNITS 3 AND 4
Docket Nos. 50-250 and 50-251

Marked-up Technical Specification Pages

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Figure 6.2-1

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## LIST OF FIGURES

## 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 ~~OFFSITE~~ ONSITE AND OFFSITE ORGANIZATION

See attached insert

~~The offsite organization for facility management and technical support shall be shown on Figure 6.2-1.~~

6.2.2 FACILITY STAFF

The Facility organization shall be ~~as shown on Figure 6.2-2 and~~ 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.

Insert for Technical Specification 6.2.1, "Onsite and Offsite Organization", page 6-1

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. 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 in the plant so that continued nuclear safety is assured.

c. There shall be an individual management position in the onsite organization having responsibility for overall unit safe operation and 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 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.

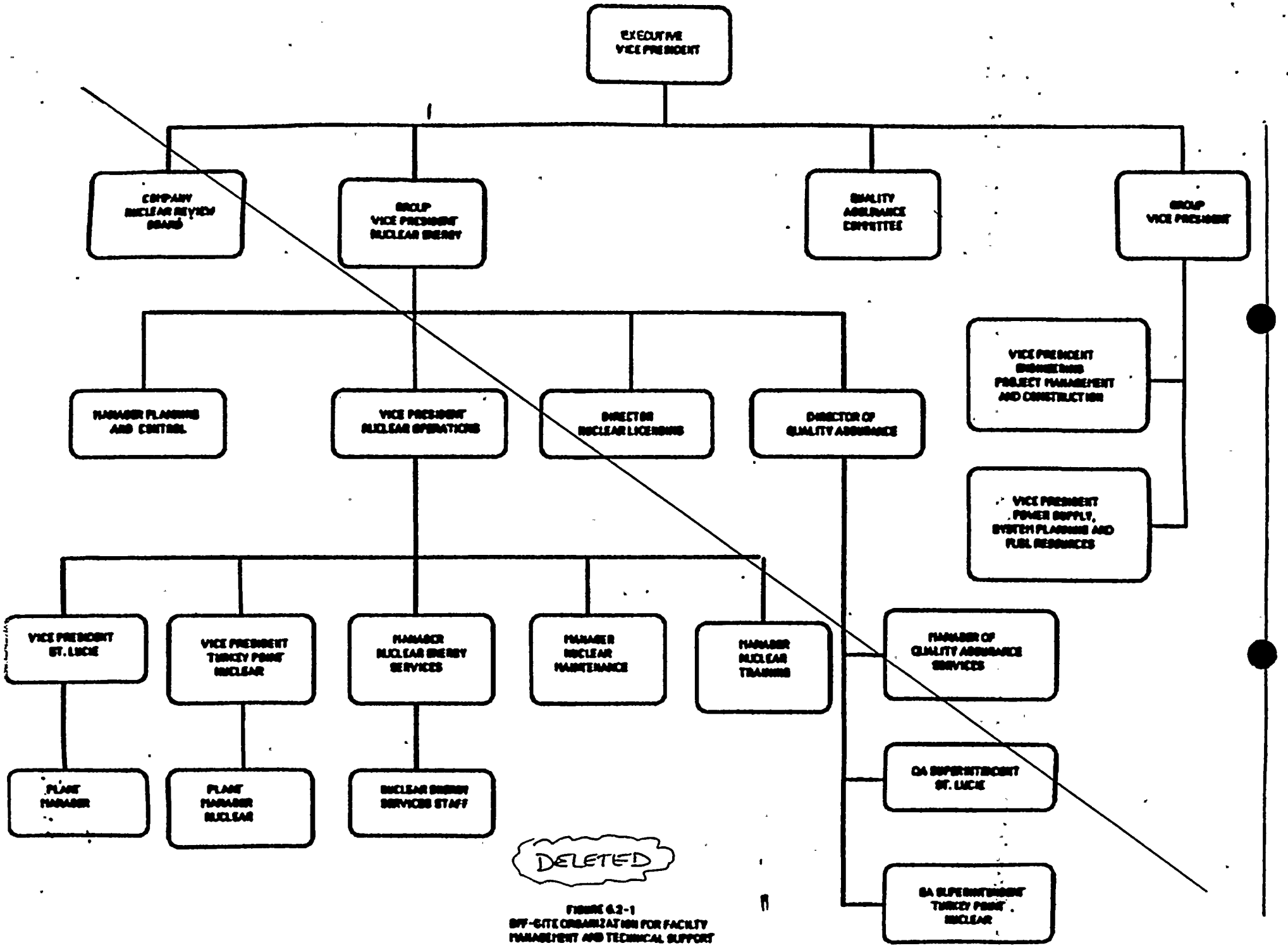


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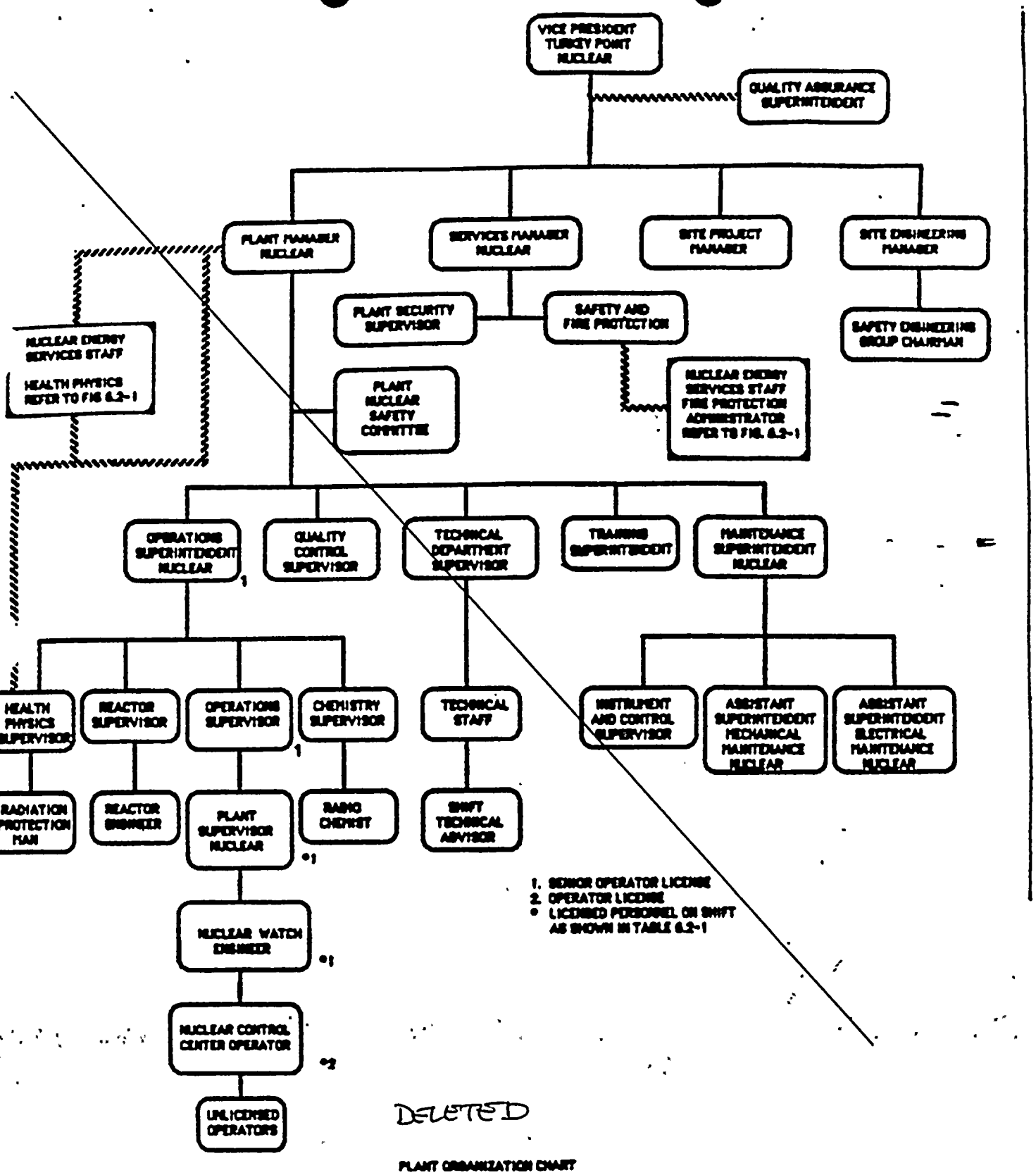
FIGURE 6.2-1
OFF-SITE ORGANIZATION FOR FACILITY MANAGEMENT AND TECHNICAL SUPPORT

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PLANT ORGANIZATION CHART
FIGURE 6.2-2



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TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION #

| LICENSE CATEGORY QUALIFICATIONS | ONE OR TWO UNITS OPERATING[A] | 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.



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d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reac[redacted]

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 onsite 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

## 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.

* Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accomodate 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 ~~Vice President - Nuclear Operations, to the Group Vice President - Nuclear Energy~~ and to the Chairman of the Company Nuclear Review Board.

Senior corporate nuclear officer

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 ~~immediate~~ 24 hour written notification to the ~~Vice President of Nuclear Operations~~ senior corporate nuclear officer 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

Senior corporate nuclear officer

The Plant Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to the ~~Vice President - Nuclear Operations~~ 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. | ~~Chairman~~ Member: | ~~Group Vice President - Nuclear Energy~~ Senior Vice President - Nuclear Energy |
| 2. | Member: | Vice President - Nuclear ~~Operations~~ 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 Fuels |
| 9. | Member: | ~~Senior Project~~ 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, ~~the Vice President - Nuclear Operations, and the Group Vice President - Nuclear Energy~~ and the senior corporate nuclear officer.

## 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 ~~Vice President of Nuclear Operations~~ senior corporate nuclear officer 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. Senior corporate nuclear officer

d. The Safety Limit Violation Report shall be submitted to the CNRB, the ~~Vice President of Nuclear Operations~~ 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.