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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising Section 6.0 by adding more general organizational titles.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

OCTOBER 3 1990

L-90-322
10 CFR 50.90

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Organizational Titles

In accordance with 10 CFR 50.90, Florida Power & Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify the Turkey Point Units 3 and 4 Technical Specifications to revise Section 6.0, Administrative Controls, by adding more general organizational titles.

FPL has determined that the proposed amendments do not involve a significant hazards consideration pursuant to 10 CFR 50.92. A description of the amendment request and the basis for a no significant hazards determination is provided in Attachment 1. Marked-up copies of the affected Technical Specification pages (corresponding over-leaf pages are also provided) are included as Attachment 2.

In accordance with 10 CFR 50.91(b)(1), a copy of this proposed license amendment is being forwarded to the State Designee for the State of Florida.

The proposed amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

The Topical Quality Assurance Report will be revised to reflect the organizational title definitions. These organizational title definitions will not reduce the FPL Topical Quality Assurance Program commitments previously accepted by the NRC.

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L-90-322
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Should there be any questions on this request, please contact us.

Very truly yours,



W. H. Bohike
Vice President
Nuclear Engineering and Licensing

WHB/lef

Attachments

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. Jacob Daniel Nash, Florida Department of Health and
Rehabilitative Services

STATE OF FLORIDA)
) ss.
COUNTY OF PALM BEACH)

W. H. Bohlke being first duly sworn, deposes and says:

That he is Vice President, Nuclear Engineering and Licensing, of Florida Power and Light Company, the Licensee herein;

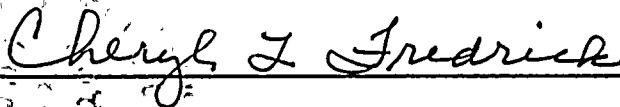
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



W. H. Bohlke

Subscribed and sworn to before me this

3RD day of OCTOBER, 1990.



NOTARY PUBLIC, in and for the County of
Palm Beach, State of Florida

My Commission expires _____

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. OCT. 30, 1991
BONDED THRU GENERAL INS. UND.

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**ATTACHMENT
ONE**

**DESCRIPTION OF AMENDMENT
REQUEST, AND**

**BASIS FOR NO SIGNIFICANT
HAZARDS CONSIDERATION
DETERMINATION**

Turkey Point Units 3 and 4
Proposed License Amendment

Title: Organizational Titles

Description of Amendment

The proposed amendments revise Section 6.0, Administrative Controls, of the Turkey Point Units 3 and 4 Technical Specifications to add general organizational titles.

References to the "Senior Vice President-Nuclear" or "Executive Vice President" are changed to "Senior Corporate Nuclear Officer" to minimize the need for future changes to the Technical Specifications as a result of organizational or title changes. The title "Senior Corporate Nuclear Officer" will be assigned to a particular officer of FPL and this assignment will be clearly indicated in the FPL Topical Quality Assurance Report (FPLTQAR 1-76A). This topical report contains the description of the FPL Quality Assurance Program relative to its nuclear power plants.

Section 1.0 (TQR 1.0) of FPLTQAR 1-76A discusses FPL's organizational structure. Section 1.2.1, Nuclear Division, provides a detailed discussion of the organizational structure and positional responsibilities for the control of, and responsibility for, nuclear power plant design, preoperational and start-up testing, operation, maintenance, refueling, and modification of the plants in accordance with written and approved procedures. It is in this section that FPL proposes to define its Senior Corporate Nuclear Officer.

Organizational relationships and responsibilities will continue to be described in detail in the FPL Topical Quality Assurance Report. Appendix B to 10 CFR 50.54(a) (3) govern changes to the organizations described in the Topical Quality Assurance Report. Changes to this program description which reduce commitments previously accepted by the NRC will require NRC approval prior to implementation.

Revisions and changes to FPLTQAR 1-76A are made in accordance with a Quality Procedure as outlined in Section 2.0 of the topical. A change to the FPL Nuclear Division Officer designated as the Senior Corporate Nuclear Officer would need to be accomplished in accordance with a Quality Procedure and the proposed change would be evaluated against the requirements of 10 CFR 50.54(a) (3). A change to the officer designated as the Senior Corporate Nuclear Officer that is evaluated as reducing commitments made to the NRC would, necessarily, be submitted to the NRC for prior review and approval. A change to the officer designated as The Senior Corporate Nuclear Officer that does not reduce a commitment to the NRC would be submitted to the NRC at least annually.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulations, 10 CFR 50.92, which states that no significant hazards considerations are involved if the operations 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 as follows:

- (1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes being proposed are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

- (2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed are administrative in nature and will not lead to material procedure changes or to physical modifications. Therefore, the proposed changes do not create the possibility of a new or different kind of accident.

- (3) Use of the modified specification would not involve a significant reduction in a margin of safety.

The changes being proposed are administrative in nature and do not relate to or modify the safety margins defined in, and maintained by, the Technical Specifications. The NRC will continue to be informed of organizational changes through controlled mechanisms. The Topical Quality Assurance Report provides a detailed description of organization and responsibilities as well as detailed organizational charts.

Based on the above, we have determined that the amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the probability of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazards consideration.

Changes to the Topical Quality Assurance Report are governed by 10 CFR 50.54(a) (3). Changes to the Topical Quality Assurance Report description that reduce commitments previously accepted by the NRC require NRC approval prior to implementation. FPL will continue to inform the NRC of organizational changes affecting the Turkey Point Plant.