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AUTH.NAME AUTHOR AFFILIATION
PLUNKETT,T.F. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Suppls 930211 application for amends to Licenses DPR-31 & DPR-41,modifying TS Section 6.0, "Administrative Controls" to address licensed qualifications of operations manager,per 930323 meeting w/NRC.Curriculum for training course encl.

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P.O. Box 029100, Miami, FL, 33102-9100

APR 23 1993

L-93-108
10 CFR 50.36
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
Operations Manager Qualifications

By letter L-93-033, dated February 11, 1993, Florida Power & Light Company (FPL) proposed to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 by modifying the Turkey Point Units 3 and 4 Technical Specifications Section 6.0, "Administrative Controls," in accordance with 10 CFR 50.90. The purpose of these amendments was to address the licensed qualifications of the Operations Manager. FPL met with the NRC staff on March 23, 1993, to discuss the proposed license amendments. As a result of the March 23 meeting, FPL proposes to revise its February 11, 1993, submittal.

A Safety Analysis of the revised amendments request is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazard pursuant to 10 CFR 50.92. The no significant hazards determination in support of the proposed Technical Specification change is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications.

In accordance with 10 CFR 50.91 (b)(1), a copy of these proposed license amendments are 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.

FPL requests that the NRC review and approve this amendments request as expeditiously as possible to permit the prompt implementation of organizational changes.

Should there be any questions on this request, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/ew

Attachments

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. W. A. Passetti, Florida Department of Health and Rehabilitative Services

A001
1/1

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Nuclear Plant, 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.

T. F. Plunkett

Subscribed and sworn to before me this 23 day of April, 1993.

Gillian Dale Herbenick

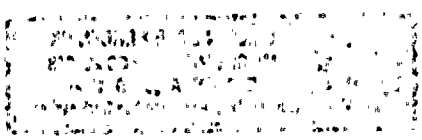
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of Dade, State of Florida

GILLIAN DALE HERBENICK
MY COMMISSION # CC 220643
EXPIRES: August 9, 1996
Bonded Thru Notary Public Underwriters

My Commission expires
Commission No.

T. F. Plunkett is personally known to me.



L-93-108

ATTACHMENT 1

Safety Analysis

Safety Analysis

Introduction and Purpose

To provide additional organizational flexibility, Florida Power & Light Company (FPL) proposes to change the Technical Specifications' requirement that the Operations Manager either hold or have held a Senior Reactor Operator (SRO) License on the Turkey Point Plant, or have held a Senior Reactor Operator License on a similar plant. FPL believes that the proposed changes will result in the Operations department off-shift management organization continuing to meet or exceed the minimum facility staff qualifications of standard ANSI N18.1-1971 for comparable positions. The basis for FPL's conclusion is discussed below.

The proposed amendments revise Specification 6.0, "Administrative Controls," of the Turkey Point Units 3 and 4 Technical Specifications. FPL proposes to require that the Operations Manager either, (1) hold or have held a Senior Reactor Operator License at Turkey Point; or, (2) have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); or, (3) have held a Senior Reactor Operator License on a boiling water reactor and completed the Turkey Point Nuclear Plant Senior Management Operations Training Course. A description of, and justification for, these changes are provided below.

Current Requirements

Turkey Point Units 3 and 4 Technical Specification 6.2.2.i requires

> The Operations Manager shall either hold or have held a Senior Reactor Operator License on the Turkey Point Plant, or have held a Senior Reactor Operator License on a similar plant (i.e. another pressurized water reactor).

Discussion

To provide additional organizational flexibility, FPL proposes to amend Technical Specification 6.2.2.i. to permit, as an additional qualification condition for filling the Operations Manager position, having held a Senior Reactor Operator's license at a boiling water reactor, coupled with completion of the Turkey Point Nuclear Plant Senior Management Operations Training Course. FPL believes that the proposed changes will result in the Operations department off-shift management organization continuing to meet or exceed the minimum facility staff qualifications of ANSI N18.1-1971 for comparable positions.

FPL's operating organization at Turkey Point Plant is shown in the enclosed organizational chart (Enclosure 1) (Figure 1-2, Appendix A from the NRC-approved FPL Topical Quality Assurance Report (TQAR)). While the Operations Manager is responsible for the plant's operating organization, his responsibilities also include management of the plant's Health Physics and Chemistry departments. The on-shift Operations organization is supervised by the Operations Supervisor, who is currently required by Technical Specification 6.2.2.h. to hold

a Senior Reactor Operator License. The Operations Supervisor and Nuclear Plant Supervisors maintain SRO Licenses on Turkey Point.

The Turkey Point Plant on-shift Operations organization manning requirements are called out in the Turkey Point Units 3 and 4 Technical Specification Table 6.2-1, MINIMUM SHIFT CREW COMPOSITION. These minimum shift manning requirements for a two unit site with a common control room meet the requirements of 10 CFR §50.54(m). FPL does not propose to change any shift manning requirements by this proposed change. Additionally, the on-shift and off-shift organizations provide for an individual who meets the requirements of 10 CFR §50.54(l) for a licensed individual who directs the licensed activities of licensed operators.

Standard ANSI N18.1-1971 states that the Operations Manager shall hold a Senior Reactor Operator's License at the time of appointment to the position. FPL proposes that the intent of this ANSI guidance can be met by the Operations Manager having operational experience on another power reactor other than Turkey Point. The Operations Manager will have thus gained the operational experience required for the Operations Manager position as well as that required for examination by the NRC for an SRO's license. Additionally, if this experience has been gained at a boiling water reactor, FPL believes that the proposed Technical Specification requirements will ensure that the Operations Manager can meet the training experience normally required for the Operations Manager position as well as that required for examination by the NRC for a SRO's license. The proposed change will permit the Operations Manager to have held an SRO at a boiling water reactor as long as the incumbent has completed the Turkey Point Nuclear Plant Senior Management Operations Training Course. The Turkey Point Nuclear Plant Senior Management Operations Training Course is discussed below.

Turkey Point Nuclear Plant Senior Management Operations Training Course

Description

The Turkey Point Nuclear Plant Senior Management Operations Training Course provides SRO-level training on reactor plant fundamentals, plant systems, procedures, and operating principles to selected senior managers who do not hold an NRC SRO license for Turkey Point Units 3 and 4.

The Turkey Point Nuclear Plant Senior Management Operations Training Course is a tailored training course intended to meet the unique needs of managers at Turkey Point Nuclear who are responsible for the plant's operations, maintenance, engineering, and administration but who will not be completing all requirements for an SRO license. All training materials used for the Turkey Point Nuclear Plant Senior Management Operations Training Course have been developed using a Systems Approach to Training (SAT) process.

Objective

The objective of the Turkey Point Nuclear Plant Senior Management Operations Training Course is to ensure that, upon completion of the course, the student will have successfully demonstrated an

understanding and knowledge of plant fundamentals, systems, and procedures used in plant operations by on-shift managers. The student also attains a knowledge and understanding of plant response, and the necessary operator actions, to prevent or mitigate abnormal and emergency conditions. A representative curriculum for the Turkey Point Nuclear Plant Senior Management Operations Training Course is enclosed (Enclosure 2). The attached curriculum represents the scope of training recently conducted for this course; the content of the training course will be maintained current using the SAT process.

Achievement of the Turkey Point Nuclear Plant Senior Management Operations Training Course objective is verified by the student's satisfactory completion of a comprehensive written examination that is similar in scope and content to an NRC SRO licensing examination. The student enrolled in the Turkey Point Nuclear Plant Senior Management Operations Training Course is exposed to extensive simulator training and is also required to demonstrate the ability to complete various Job Performance Measures (JPMs) in the plant. A representative listing of JPMs for the Turkey Point Nuclear Plant Senior Management Operations Training Course is enclosed (Enclosure 3).

On completion of the Turkey Point Nuclear Plant Senior Management Operations Training Course, the student receives a certificate of completion indicating that the student has acquired the training normally required for examination by the NRC for a Senior Reactor Operator's license.

Summary

The Turkey Point Nuclear Plant Senior Management Operations Training Course provides SRO-level training on reactor plant fundamentals, plant systems, procedures, and operating principles to selected senior managers who do not hold an NRC SRO license for Turkey Point Units 3 and 4. The training course is tailored to meet the unique needs of managers at Turkey Point Nuclear who are responsible for the plant's operations, maintenance, engineering, and administration. All training materials used for the Turkey Point Nuclear Plant Senior Management Operations Training Course have been developed using the SAT process. The content of the training course will be maintained current using the SAT process. On completion of the training course, the student receives a certificate of completion indicating that the student has acquired the training normally required for examination by the NRC for a Senior Reactor Operator's license.

Proposed Technical Specifications Changes

FPL proposes to change Technical Specification 6.2.2.i. to read as follows (with the proposed changes in bold-face type).

The Operations Manager shall either:

(1) hold or have held a Senior Reactor Operator License on the Turkey Point Plant; or,

(2) have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); **or,**

(3) **have held a Senior Reactor Operator License on a boiling**

water reactor and completed the Turkey Point Nuclear Plant Senior Management Operations Training Course.

Justification: The proposed revision to Technical Specification 6.2.2.i. discussed above will ensure that the individual filling the Operations Manager's position has held, at some point in time, an SRO License. This requirement will ensure that the Operations Manager has the operational experience required by ANSI N18.1-1971 for the Operations Manager position as well as that required for examination by the NRC for a Senior Operator's license. Additionally, if this experience has been gained at a boiling water reactor, FPL believes that the proposed Technical Specification requirements will ensure that the Operations Manager can meet the pressurized water reactor training experience normally required for the Operations Manager position as well as that required for examination by the NRC for a Senior Operator's license. The proposed change will permit the Operations Manager to have held an SRO at a boiling water reactor as long as the incumbent has completed the Turkey Point Nuclear Plant Senior Management Operations Training Course. This change will permit FPL to exercise additional discretion in the assignment of highly qualified individuals to Operations' management positions.

Summary

FPL proposes to permit three options for Senior Reactor Operator licensing for the Operations Manager at Turkey Point. Any of these three options meets the intent of ANSI N18.1-1971 with respect to the Operations Manager having the experience and training necessary to successfully and safely direct the activities of the Operations department.

FPL's proposed changes are consistent with the intent of ANSI N18.1-1971 with respect to the standard's guidance for a licensed senior operator in the Operations' organization off-shift management chain of command. The qualifications guidance of standard ANSI N18.1-1971, as required by Turkey Point Technical Specification 6.3.1, FACILITY STAFF QUALIFICATIONS, will ensure that, other than license certification, the individual filling the Operations Manager position has the requisite education, training, and experience for the management position. Additionally, the proposed changes do not impact nor change, in any way, the minimum on-shift manning or qualifications for those individual responsible for the actual licensed operation of the facility. The Operations Supervisor and Nuclear Plant Supervisors maintain SRO Licenses on Turkey Point. FPL's operating organization at Turkey Point Plant is presented in Figure 1-2, Appendix A of the NRC-approved FPL TQAR.

L-93-108
Attachment 1

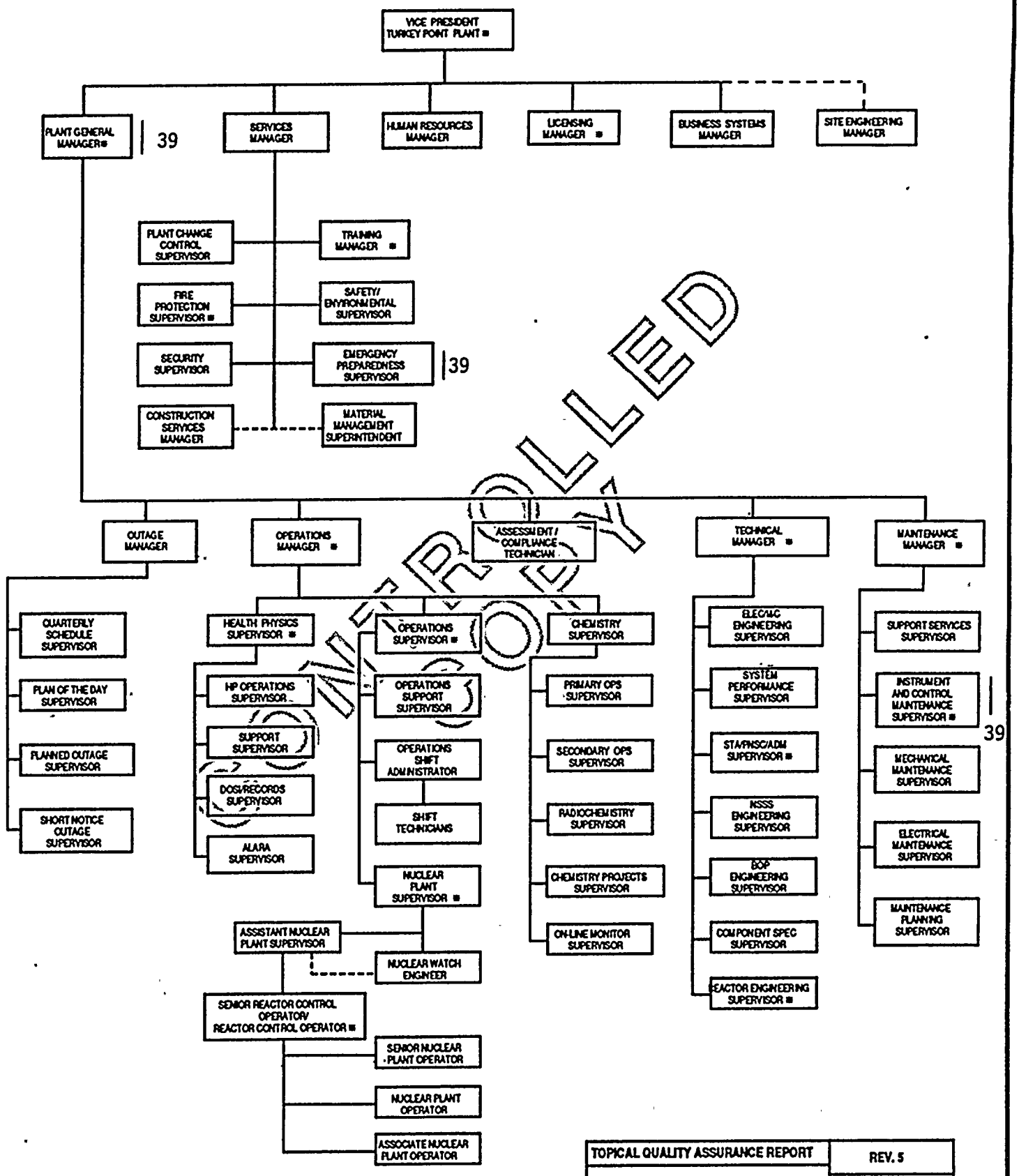
Enclosure 1

to

Attachment 1

FPL Topical Quality Assurance Report

Appendix A, Figure 1-2



* - Indicates position with accountabilities in Technical Specifications.

TOPICAL QUALITY ASSURANCE REPORT	REV. 5
TURKEY POINT NUCLEAR SITE ORGANIZATION FIGURE 1-2 APPENDIX A	1/15/92
	PAGE 1 OF 1

L-93-108
Attachment 1

Enclosure 2

to

Attachment 1

Representative Curriculum

for the

Turkey Point Nuclear Plant

Senior Management Operations Training Course

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
(* On the Simulator)

LESSON TOPIC OR SIMULATOR EXERCISE

SD-140 MAIN POWER DISTRIBUTION
TS SECTION 1
TS SECTION 2
TS 3.8.3
SD-144 125VAC/120VDC DIST.
TS 3.8.2
SD-137 EMERGENCY DIESEL GENERATOR
SD-137 EMERG DIESEL GENERATOR
TS 3.8.1
ONOP-23.2 EDG FAILURE
TS SECTIONS 3.0 & 4.0
SD-170 EMERG LOAD SEQ/STRIPPING
SD-139 MAIN GENERATOR & CONTROLS
SD-127 MAIN TURBINE CONTROL
ONOP-9108.1 MAIN TRANS. MALF.
SD-165 INTAKE COOLING SYSTEM
TS 3.7.3-4
SD-132 TURBINE PLANT COOLING WATER
ONOP-008 TPCW MALFUNCTION
SD-123 CONDENSER & CIRC WATER
ONOP-014 LOSS OF COND. VAC.
SD-117 AUXILIARY FEEDWATER SYSTEM
TS 3.7.1.2-3, 3.7.1.6
ONOP-7308.1 AFW MALFUNCTION
SD-11 STEAM GENERATOR
TS 3.7.1.1, .4-5
SD-104 MAIN & EXTRACTION STEAM
SD-105 STEAM DUMP
SD-153 ASP & FIRE PROTECTION
SD-112 CONDENSATE AND FEEDWATER
SD-111 FEEDWATER HEATERS & DRAINS
SD-68 RADIATION MONITORING & PROT.
TS 3.3.3.1, .5-6, 3.11-12
ONOP-66 ARMS ONOP
SD-2 REACTOR VESSEL & INTERNALS
SD-3 INCORE INSTRUMENTATION
TS 3.2.2-3, 3.3.3.2
SD-4 EXCORE NUCLEAR INST
TS 3.2.1, 3.2.4
ONOP-59 SERIES NIS MALF.
SD-7 REACTOR COOLANT SYSTEM
TS 3.4.1-11
ONOP-41.4 EXCESSIVE RCS ACTIVITY

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
(* On the Simulator)

LESSON TOPIC OR SIMULATOR EXERCISE

ONOP-41.3 EXCESSIVE RCS LEAKAGE
SD-8 REACTOR COOLANT PUMPS
SD-9 PRESSURIZER
TS 3.2.5
ONOP-1208.1 PORV MALFUNCTION
SD-29 CONT. VENT & HEAT REMOVAL
TS 3.6.1, 3.6.4
SD-13 CHEMICAL & VOLUME CONTROL
TS 3.1.1-2
SD-25 CONTAINMENT SPRAY
TS 3.6.2-3
SD-28 CNMT POST ACC MON. & PASS
TS 3.3.3.3, 3.6.5-6
SD-21 ECCS
TS 3.5
SD-6 ROD POSITION INDICATION
ONOP-46.1 EMERGENCY BORATION
ONOP-47.1 LOSS OF CHRGNG MODE 1-3
ONOP-2608.2 CVCS BORON MALF.
SYSTEMS EXAM #2
SD-5 ROD CONTROL
TS 3.1.3.1, .4-6, 3.10.1-3
ONOP-28 SERIES ROD CNTRL. MALF.
SD-63 REACTOR PROT & SAFEGUARDS
TS 3.3.1-2
SD-44 FUEL HANDLING
TS 3.9
ONOP-33.3 ACC. INVL. SPENT FUEL
ONOP-33.2 REF. CAVITY SEAL FAIL.
SD-40 COMPONENT COOLING WATER
TS 3.7.2
ONOP-30 LOSS OF CCW
ONOP-3108.2 HIGH ACTIVITY IN CCW
ONOP-019 LOSS OF ICW
ONOP-1108.1 RCP OFF-NORMAL
ONOP-11108.1 PROC. RAD. ONOP
SD-121 WATER TREATMENT
SD-48 PRI MU & DEMIN WATER
ONOP-105 CONTROL ROOM EVACUATION
SD-46 PRI SAMPLING SYSTEM
SD-47 PRI CHEMISTRY
SD-118 SEC SAMPLING & CHEMISTRY
SD-49 LIQUID WASTE DISPOSAL
SD-50 GASEOUS WASTE DISPOSAL
SD-51 SOLID WASTE DISPOSAL

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
(* On the Simulator)

LESSON TOPIC OR SIMULATOR EXERCISE

TS 3/4.11
SD-166 VENTILATION & AIR COND
SD-164 COMPRESSED GAS
SD-133 MAIN GEN GAS AND SEAL OIL
SD-130 TURBINE, TURB OIL & GS
SD-155 PLANT AIR SYSTEMS
SD-41 SFP COOLING AND VENT
ONOP-33.1 SFP COOLING MALF.
SD-119 CONDENSATE DEMINERALIZERS
SD-102 SG BLOWDOWN
SD-103 SG WET LAYUP/RECIRC
SD-106 AUX STEAM & COND RECOVERY
SD-160 SCREENWASH & INTAKE
SD-152 PLANT COMMUNICATIONS
TS SECTION 6.3 - 6.5
TS SECTION 6.6 - 6.10
SYSTEMS EXAM #3
NUCLEAR PHYSICS CH. 2 (211)
NUCLEAR REACTIONS CH. 3 (211)
NEUTRON PHYSICS CH. 4 (211)
REACTOR PHYSICS CH. 5 (211)
NEUTRON KINETICS CH. 7 (211)
SUBCRITICAL MULT CH. 8 (211)
REACTOR CORE CONSTR CH. 1 (219)
REACT & FTC EFFECTS CH. 2 (219)
MTC & TOTAL PWR DEF CH. 3 (219)
FISSION PROD POISONS CH. 4 (219)
CHEMICAL SHIM CONTROL CH. 5 (219)
CONTROL ROD REACTIVITY CH. 6 (219)
SHUTDOWN REACTIVITY CH. 7 (219)
CORE POWER DIST CH. 8 (219)
REACTIVITY CONT OPS CH. 9 (219)
REACTOR HEAT TRANSFER CH. 3 (221)
REACTOR & PRZR THERMO CH. 4 (221)
HEAT EXCHANGERS CH. 5 (221)
STEAM GENERATOR THERMO CH. 6 (221)
TURBINE/THERMO/RANKINE CH.7 (221)
TURB FLUID MECH CH. 8 (221)
PUMP FLUID MECH CH. 10 (221)
DESIGN/OPER LIMITS CH. 13 (221)
COMP FUND - MECH SYS COMPONENTS
COMP FUND - ELECTRICAL SYS COMPONENTS
COMP FUND - INST, SENSORS & DETECTORS
COMP FUND - AIR OPER VALVES & CONTROLLER

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
(* On the Simulator)

LESSON TOPIC OR SIMULATOR EXERCISE

NEUTRON SOURCES, 1/M, SU TECH
SPECS
REACTOR SU & SUBCRITICAL
MULTIPLICATION
REF. REACTIVITY, ECC, SDM
FUNDAMENTALS COMPREHENSIVE EXAM
*REACTOR START-UPS (3)
GOP-503 CSD TO HSBY
GOP-301 HSBY TO POWER
*REACTOR START-UPS (3)
SELF-STUDY FOR SU CERTIFICATION
*REACTOR START-UP
*REACTOR START-UP
*REACTOR START-UP
*REACTOR START-UP
SOER 88-2: PREMATURE CRITICALITY
*REACTOR START-UP
*REACTOR START-UP
*REACTOR START-UP EVALUATIONS (2)
GOP-103 POWER TO HSBY
GOP-305 HSBY TO CSD
*REACTOR START-UP EVALUATIONS (3)
E-PLAN OVERVIEW
NOTIFICATIONS/COMMUNICATIONS
EMERGENCY CLASSIFICATIONS
TRANS. OF CONT. INJURED PERS.
MGT. CONTROL OF EMERGENCIES
RAD ASSESSMENTS/PARS
TECHNICAL SUPPORT CENTER
EPIP-20126
OPERATIONAL SUPPORT CENTER
EVACUATION & ACCOUNTABILITY
ADM-211 EOP & ONOP USAGE
E-0 RX TRIP OR SI
ES-0.0 REDIAGNOSIS
ES-0.1 RX TRIP RESPONSE
ES-0.2 NATURAL CIRC COOLDOWN
ES-0.3 N/C CD WITH VOID (RVLMS)
ES-0.4 N/C CD WITH VOID (NO RVLMS)
E-1 LOSS OF RX OR SEC COOLANT
ES-1.1 SI TERMINATION
ES-1.2 POST-LOCA CD
ES-1.3 XFER TO COLD LEG RECIRC
ES-1.4 XFER TO HOT LEG RECIRC
E-2 FAULTED SG ISOLATION
ONOP-67 INADV. GAS RELEASE
E-3 SG TUBE RUPTURE

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
(* On the Simulator)

LESSON TOPIC OR SIMULATOR EXERCISE

ES-3.1 SGTR CD USING BACKFILL
ES-3.2 SGTR CD USING BLOWDOWN
ES-3.3 SGTR CD USING STM DUMPS
ECA-3.1 SGTR/RCS SUBCOOLED
ECA-3.2 SGTR/RCS SATURATED
ECA-3.3 SGTR/NO PRES CONTROL
ECA-0.0 LOSS OF ALL AC
ECA-0.1 RECOVERY W/O SI
ECA-0.2 RECOVERY WITH SI
F-0 CSF STATUS TREES
FR-S.1,2 ATWS/LOSS OF S/D
FR-C.1-3 CORE COOLING
FR-H.1-5 SEC HEAT SINK
FR-P.1,2 PRES THERMAL SHOCK
FR-Z.1-3 CONTAINMENT
FR-I.1-3 INTEGRITY
ECA-1.1 LOSS OF EMERG RECIRC
ECA-1.2 LOCA OUTSIDE CNMT
ECA-2.1 DEPRES OF ALL SG'S
SELF-STUDY EOP/EPIP EAXM PREP
EPIP/EOP EXAM
*SECONDARY PLANT LOADING
*INADVERTANT REACTOR TRIP
ONOP-100 FAST LOAD REDUCTION
ONOP-089 TURBINE RUNBACK
ONOP-041.3 EXCESSIVE RCS LEAKAGE
ONOP-41.5 PRZ PRESS. CNTRL. MALF.
ONOP-004 LOSS OF OFF-SITE POWER
*SECONDARY PLANT LOADING
*FEED REG VALVE FAILURE/ATWS
*GUIDED STUDY / JPMS
ONOP-41.6 PRZ LEVEL CONTRL. MALF.
ONOP-208.14 PROT CHANNEL FAILURE
*FEED REG VALVE FAILURE/ATWS
*INADVERTANT SAFETY INJECTION
*LBLOCA
*SBLOCA
ONOP-004.2 LOSS OF "A" BUS
ONOP-004.3 LOSS OF "B" BUS
ONOP-004.4 LOSS OF "C" BUS
ONOP-004.5 LOSS OF "D" BUS
*LARGE BREAK LOCA
*STEAM BREAK OUTSIDE CONTAINMENT
*STEAM BREAK IC/ATWS (IOA DRILL)
*PRESSURIZER STEAM SPACE BREAK
ONOP-004.1 REST. FOLLOWING LOOP

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
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LESSON TOPIC OR SIMULATOR EXERCISE

ONOP-71 SG TUBE LEAK
*STEAM BREAK INSIDE CONTAINMENT
*LBLOCA/LOSS OF OFFSITE POWER
*LOSS OF ALL FEED ATWS
ONOP-046.1 EMERG BORATION
ONOP-11108.1 PRMS OFF-NORMAL
ONOP-059.X NIS FAILURES
*LOSS OF ALL AC
*STEAM GENERATOR TUBE LEAK
ONOP-003.7 LOSS OF 3P07
ONOP-003.4 LOSS OF 3D01
*STEAM BREAK IC/ATWS
*LOSS OF 3P07/FEEDWATER BREAK IC
ONOP-3208.1 LOSS OF RHR INVENTORY
ONOP-050 LOSS OF RHR
ONOP-019 ICW MALFUNCTION
*SELECTED IOA DRILLS (5)
ONOP-028.X ROD CONTROL MALF'S
*JPMS FOR COLD AND HOT LEG RECIRC
*LOSS OF TURBINE LOAD/ATWS (IOA DRILL)
*STEAM GENERATOR TUBE RUPTURE
ONOP-030 LOSS OF CCW
ONOP-1208.1 PORV MALF
*LOSS OF TURB LOAD/ATWS (IOA DRILL)
*SBLOCA/ATWS
*STEAM GENERATOR TUBE RUPTURE
ONOP-1108.1 RCP MALFUNCTIONS
ONOP-047.1 LOSS OF CHG MODE 1-4
ADM-031 INDEPENDENT VERIFICATION
*STEAM BREAK OC (IOA DRILL)
*LOSS OF ALL AC
*LOSS OF ALL FEED/HEAT SINK
*STEAM BREAK IC/ATWS
ADM-200 CONDUCT OF OPERATIONS
ADM-215 PLANT SURV TRACKING
ADM-212 EQUIP CLEARANCE ORDERS
*STEAM BREAK IC/ATWS/LOSS OF 3A 4KV BUS
*LOSS OF ALL AC/PORV STUCK OPEN
*FAULTED/RUPTURED SG
TAA-INTRO & NORM TRANSIENT ANAL.
TAA-ABNORMAL TRANSIENT ANAL.
TAA-INTRO TO ACCIDENT ANAL.
*SIMULATOR EVALUATIONS
*SIMULATOR EVALUATIONS

NUCLEAR MANAGEMENT OPERATIONS
TRAINING AND CERTIFICATION PROGRAM
TOPIC LISTING
(* On the Simulator)

LESSON TOPIC OR SIMULATOR EXERCISE

FINAL COMPREHENSIVE EXAM
TAA-INCREASED HEAT REMOVAL ACC.
TAA-DECREASED HEAT REMOVAL ACC.
TAA-PRI REACTIVITY ADD. ACC.
TAA-LOSS OF COOLANT ACC.
TAA-STEAM GEN TUBE RUPTURE
TAA-LOSS OF FLOW ACC.
MCD-REACTIVITY AND THERMO (REVIEW)
MCD-SYSTEMS (REVIEW)
MCD-CRITICAL PARAMETERS
MCD-PROCEDURES (REVIEW)
MCD-SUBCRITICALITY
MCD-CORE COOLING
MCD-HEAT SINK
MCD-INTEGRITY
MCD-CONTAINMENT
MCD-ACC RESPONSE OF INSTRUMENTS
MCD-CORE ASSESSMENT DAMAGE
MCD-RAD. ASPECTS OF CORE DAMAGE
TAA/MCD EXAM

L-93-108
Attachment 1

Enclosure 3

to

Attachment 1

Representative Job Performance Measures (JPMs)

for the

Turkey Point Nuclear Plant

Senior Management Operations Training Course

SELECTED JPM'S FOR NUCLEAR OPERATIONS MANAGEMENT TRAINING

SEQ NO.	JPM/MODULE NUMBER	JPM TITLE	EXAMINER INITIALS	DATE
** TEST TYPE JPM				
002	24200017300	RESPOND TO CR EVAC AS OUTSIDE SNPO	_____	/ /
003	24200016300	RESPOND TO CR EVAC AS INSIDE SNPO	_____	/ /
006	14200014300	RESPOND TO CR EVAC AS NON-FIRE BRIGADE NPO	_____	/ /
012	01050007300	RESPOND TO LOSS OF RHR W/O RCP'S	_____	/ /
013	01050005500	ALIGN FOR COLD LEG RECIRCULATION	_____	/ /
019	01046029100	SET UP BLENDER FOR AUTO OPERATION	_____	/ /
034	01028022100	CONDUCT A 1/M PLOT (STARTUP CERT)	_____	/ /
036	01028010300	PERFORM A DROPPED ROD RECOVERY	_____	/ /
044	01005023300	POWER B 4KV BUS FROM THE BLACKSTART DESIELS	_____	/ /
045	01005021300	POWER THE C 4KV BUS FROM THE OPP UNIT C TRANS	_____	/ /
047	01005018100	TRANSFER FROM AUX TRANS TO SU TRANS	_____	/ /
054	01062012500	ALIGN SI FOR HOT LEG RECIRC	_____	/ /
055	01062013500	ALIGN SI FOR COLD LEG RECIRC	_____	/ /
073	01046054300	PERFORM POST ACCIDENT RCS CHEM INJECTION	_____	/ /
080	02001011400	REPORT SIGNIFICANT EVENTS	_____	/ /
083	01094001500	PLACE POST ACC HYD MONITOR IN OPER	_____	/ /
086	02016007400	RESPOND TO A PLANT FIRE	_____	/ /
092	14028020100	PARALLEL MOTOR GENERATOR SETS	_____	/ /
101	01041064300	VERIFY NAT/CIRC FROM THE ASP	_____	/ /
104	24094001500	PLACE POST ACC HYD MONITOR IN SER	_____	/ /

SELECTED JPM'S FOR
NUCLEAR OPERATIONS
MANAGEMENT TRAINING

SEQ NO.	JPM/MODULE NUMBER	JPM TITLE	EXAMINER INITIALS	DATE
108	14200056500	RE-ENERGIZE BU HEATERS ON EDG	_____	/ /
110	14003026100	TRANSFER INST BUS FROM CVT TO NORMAL INVERTER (EXT)	_____	/ /
112	14005011100	RACK-IN AN A/B 4KV BUS BREAKER	_____	/ /
115	14005010100	RACK-OUT C 4KV BUS BREAKER	_____	/ /
128	02001013400	MAKE EMERGENCY NOTIFICATIONS	_____	/ /
129	02201022400	RESPOND TO A MEDICAL EMERGENCY	_____	/ /
138	01028012100	PERFORM A REACTOR STARTUP (STARTUP CERT)	_____	/ /
140	02200004300	RESPOND TO CR EVAC - NPS	_____	/ /
141	02200019300	RESPOND TO CR EVAC AS ANPS	_____	/ /
142	01200011300	RESPOND TO CR EVAC AS UNIT 3 RCO	_____	/ /
144	01200013300	RESPOND TO CR EVAC AS THIRD RCO	_____	/ /
146	01041048300	RESPOND TO RCP MOTOR HIGH TEMP, RX PWER >45%	_____	/ /
186	01046007101	BORATE THE RCS VIA THE BLENDER	_____	/ /
191	01028002100	PERFORM AN E.C.C. (STARTUP CERT)	_____	/ /
247	14003029100	PLACE THE SPARE BATTERY IN SER ON A VITAL BUS	_____	/ /
427	02201071100	APPROVE CLEARANCE REQUEST	_____	/ /
428	02201015100	APPROVE EQUIPMENT CLEARANCE ORDERS	_____	/ /
429	02201056100	REVIEW EQUIPMENT CLEARANCE ORDERS	_____	/ /
430	02201047100	APPROVE TEMPORARY SYSTEM ALTERATION	_____	/ /
999	022010524XX	CLASSIFY EVENTS (96,403,404,411, 412,413,414, OR 415)	_____	/ /
999	022010544XX	EVALUATE PARS (132,405,406,407, 408,409 OR 410)	_____	/ /

SELECTED JPM'S FOR
NUCLEAR OPERATIONS
MANAGEMENT TRAINING

SEQ NO.	JPM/MODULE NUMBER	JPM TITLE	EXAMINER INITIALS	DATE
** TEST TYPE MODULE				
XXXX	0901004	MAINTAIN OVERTIME BOOK	_____	/ /
XXXX	0901006	AUTHORIZE PLANT WORK ORDERS	_____	/ /
XXXX	0901007	REVIEW LOCKED VALVE LIST	_____	/ /
XXXX	0901008	REVIEW SHIFT LOGS	_____	/ /
XXXX	0901011	CHECK EQUIPMENT STATUS	_____	/ /
XXXX	0901015	SUPERVISE REFUELING	_____	/ /
XXXX	0901016	MAKE AUTHORIZATION JUDGEMENT	_____	/ /
XXXX	0901018	AUTHORIZE CONST WORK PERMIT	_____	/ /
XXXX	0901019	AUTHORIZE RADIATION WORK PERMIT	_____	/ /
XXXX	0901020	AUTHORIZE RADIOACTIVE RELEASE	_____	/ /
XXXX	0901023	AUTHORIZE PROT CHANNEL IN BYPASS	_____	/ /
XXXX	0901025	AUTHORIZE PROCEDURE CHANGES	_____	/ /
XXXX	0901027	AUTHORIZE LOAD CHANGE	_____	/ /
XXXX	0901028	COORDINATE STARTUP	_____	/ /
XXXX	0901030	AUTHORIZE ACCESS	_____	/ /
XXXX	0901031	VERIFY CNMT INTEGRITY	_____	/ /
XXXX	0901032	IDENTIFY/RESPOND TO OFF-NORMAL EVENT	_____	/ /
XXXX	0901038	DIRECT RESPONSE AS EMERG COOR	_____	/ /

L-93-108

Attachment 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendments

Turkey Point Units 3 and 4 Technical Specification (TS) 6.3.1 requires each member of the unit staff meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. Besides education and experience requirements, the Operations Manager must hold, or have held, an NRC Senior Reactor Operator (SRO) license on Turkey Point, or have held an SRO License on a similar plant (i.e. another pressurized water reactor) per TS 6.2.2.i.

FPL proposes to change Technical Specification 6.2.2.i. to read as follows (with the proposed change in bold-face type).

The Operations Manager shall either:

(1) hold or have held a Senior Reactor Operator License on the Turkey Point Plant; or,

(2) have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); **or,**

(3) **have held a Senior Reactor Operator License on a boiling water reactor and completed the Turkey Point Nuclear Plant Senior Management Operations Training Course.**

Introduction

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 license amendments.

Discussion

(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 change being proposed is administrative in nature, addresses organizational and personnel qualifications issues, and does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor does it affect Technical Specifications that preserve safety analysis assumptions.

The individual Florida Power & Light Company (FPL) chooses to

fill the position of Operations Manager will have extensive educational and management-level nuclear power experience meeting the criteria of standard ANSI N18.1-1971. The Operations Supervisor and Nuclear Plant Supervisors maintain SRO licenses on Turkey Point. The current Technical Specifications do not require the Operations Manager to hold an SRO License at Turkey Point. In fact, the current Technical Specifications permit the Operations Manager to have held an SRO License on a similar plant (i.e. another pressurized water reactor). The proposed change will continue to require that the Operations Manager has been licensed at another commercial nuclear power plant and that the individual has completed the Turkey Point Nuclear Plant Senior Management Operations Training Course if the incumbent's previous SRO license was held at a boiling water reactor. The Turkey Point Nuclear Plant Senior Management Operations Training Course ensures that the Operations Manager has the training on plant-specific systems and procedures at Turkey Point.

The on-shift Operations' organization is, and will continue to be, supervised and directed by the Operations Supervisor, who is currently required by Technical Specification 6.2.2.h. to hold a Senior Reactor Operator License.

Additionally, the proposed changes do not impact nor change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the facility.

Based on the above, 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 change being proposed is administrative in nature, addresses personnel qualifications issues, does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor does it affect Technical Specifications that preserve safety analysis assumptions.

The proposed changes address organizational and qualifications issues related to the criteria used for assignment of individuals to the Operations' organization off-shift management chain of command.

In light of the above, and since the proposed change does not impact nor change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the facility, 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.

(3) **Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.**

The proposed change addresses organizational and qualifications issues related to the criteria used for assignment of individuals to the Operations' organization off-shift management chain of command. The proposed change does not impact nor change, in any way, the minimum on-shift manning or qualifications for those individuals responsible for the actual licensed operation of the facility.

FPL's operating organization at Turkey Point Plant is shown on Figure 1-2, Appendix A of the NRC-approved FPL Topical Quality Assurance Report (TQAR). Since changes to the TQAR are governed by 10 CFR §50.54(a)(3), any changes to the TQAR that reduce commitments previously accepted by the NRC require approval by the NRC prior to implementation.

While the Operations Manager is responsible for the plant's operating organization, his responsibilities also include management of the plant's Health Physics and Chemistry departments. The on-shift Operations' organization is supervised and directed by the Operations Supervisor, who is required by Technical Specification 6.2.2.h. to hold a Senior Reactor Operator License. The Turkey Point Units 3 and 4 Technical Specifications do not require that the Operations Manager maintain an SRO License (nor even that the incumbent has ever held a Senior Reactor Operator License at Turkey Point). The qualifications guidance of standard ANSI N18.1-1971, as required by Turkey Point Technical Specification 6.3.1, FACILITY STAFF QUALIFICATIONS, will ensure that, other than license certification, the individual filling the Operations Manager position has the requisite education, training, and experience for the management position.

As a result, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Summary

Based on the above, FPL has determined that the 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, or (3) involve a significant reduction in a margin of safety; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.