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ACCESSION NBR:9903190220 DOC.DATE: 99/03/08 NOTARIZED: YES DOCKET #
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
AUTH.NAME AUTHOR AFFILIATION
HOVEY,R.J. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Records Management Branch (Document Control Desk)

See Proposed Change To Tech Spec

SUBJECT: Application for amends to licenses DPR-31 & DPR-41,deleting certain requirements from TS Section 6.0 that are adequately controlled by existing regulations other than 10CFR5.36 & TS.

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L-99-056
10 CFR §50.90

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Section 6.0 "Administrative Controls"

In accordance with 10 CFR §50.90, Florida Power and Light Company (FPL) requests to amend Appendix A of the Plant Operating Licenses DPR-31 and DPR-41 of the Turkey Point Units 3 and 4 Technical Specifications (TS) to revise certain provisions of TS Section 6.0, "Administrative Controls."

The proposed amendments delete certain requirements from the TS Section 6.0 that are adequately controlled by existing regulations, other than 10 CFR 50.36 and the TS. The amendments also relocate selected requirements from the TS Section 6.0 to FPL controlled documents such as the Turkey Point Units 3 and 4 Updated Final Safety Analysis Report (UFSAR). The amendments also clarify certain provisions of TS Section 6.0. The proposed amendments, discussed in detail in the attachments, are consistent with the Nuclear Regulatory Commission (NRC) guidance documents and meet the provisions of 10 CFR 50.36(c)(5).

NRC guidance on the relocation of technical specifications provisions, that are not specifically required by 10 CFR 50.36(c)(5) and not otherwise necessary in TS for the safe operation of the plant, from the plant license to licensee-controlled documents was provided in amendments to 10 CFR 50.36, Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995), Standard Technical Specifications (STS) for Westinghouse Plants (NUREG-1431), dated April 1995, and Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995. AL 95-06 provides specific guidance for relocating TS provisions of Reviews and Audits, Procedure Review Processes, and Records and Records Retention to the Quality Assurance (QA) Plan.

The FPL QA Plan is described by the FPL Topical Quality Assurance Report FPLTQAR 1-76A (TQAR). This corporate level document is supplemented by the plant UFSAR for plant-specific details. The UFSAR for Turkey Point Units 3 and 4 will be revised to relocate certain provisions related to Administrative Controls from the TS to Chapter 12 of the UFSAR which will be subject to the regulatory requirements of 10 CFR 50.54(a) for any future changes. Additionally, certain TS provisions related to Radiation Protection will be relocated to Chapter 11 of the UFSAR which will remain subject to the regulatory requirements of 10 CFR 50.59 for any future changes.

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If the proposed license amendments are approved, the revisions proposed for the UFSAR will be incorporated as part of the next periodic update for Turkey Point Units 3 and 4 UFSAR pursuant to the requirements of 10 CFR 50.71(e).

The proposed amendments are expected to reduce unnecessary regulatory burden and result in a more efficient use of NRC and FPL resources. Similar Technical Specification amendments have been approved in the past by the NRC for several other nuclear power plants, including Fermi 2 of the Detroit Edison Company, and Beaver Valley 1 and 2 of the Duquesne Light Company.

These amendments are also expected to result in a significant amount of savings, well in excess of $100,000, over the remaining plant lifetime. Those savings are realized from not having to prepare and submit license amendments for NRC review for the TS provisions being proposed for relocation, revision or deletion. Therefore, FPL requests that the proposed amendments receive consideration as a "Cost Beneficial Licensing Action."

FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR §50.92. A description and justification of the amendments request is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specifications changes is provided in Attachment 2. Attachment 3 provides the proposed revised Plant Operating Licenses and Technical Specification pages.

The proposed license amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board. In accordance with 10 CFR §50.91(b)(1), a copy of these proposed license amendments is being forwarded to the State Designee for the State of Florida. In order to accomplish procedure changes associated with this change, FPL requests that the proposed license amendment be issued with a 90-day implementation period.

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

Very truly yours,

R. J. Hovey
Vice President
Turkey Point Plant

GSS

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Florida Department of Health and Rehabilitative Services

L-99-056

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Section 6.0 "Administrative Controls"

STATE OF FLORIDA )
) ss.
COUNTY OF MIAMI-DADE )

R. J. Hovey being first duly sworn, deposes and says:

That he is Vice President, Turkey Point 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.

R. J. Hovey

Subscribed and sworn to before me this
8th day of March, 1999.

Olga Hanek

Olga Hanek
Name of Notary Public (Type or Print)

OLGA HANEK
MY COMMISSION # CC 562742
EXPIRES: June 18, 2000
Bonded Thru Notary Public Underwriters

R. J. Hovey is personally known to me.

# ATTACHMENT 1

## DESCRIPTION OF PROPOSED AMENDMENTS

### Purpose

The proposed license amendments revise the Turkey Point Units 3 and 4 Technical Specifications (TS) Section 6.0, "Administrative Controls," to relocate, revise, delete, or clarify certain provisions of the TS that are not necessary in the TS to assure the safe operation of the plant. The proposed changes are discussed in detail as follows.

### Background

Section 182a of the Atomic Energy Act requires of applicants for nuclear power plant operating licenses that technical specifications be included as part of the license. The NRC regulatory requirements related to the content of TS are set forth in 10 CFR 50.36 which requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls.

The NRC has recently adopted amendments to 10 CFR 50.36 (Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995)), to codify and incorporate four criteria to be used in determining whether a particular matter is required to be included in an LCO. While the criteria specifically apply to LCOs, in adopting the revision to the rule the NRC noted that it had used the intent of these criteria to identify the optimum set of administrative controls in the TS (60 FR 36957).

10 CFR 50.36(c)(5) states that "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." The specific content of the administrative controls section of the TS is, therefore, the information that the NRC deems essential for the safe operation of the plant that is not already adequately covered by other regulations. Accordingly, the NRC has determined that requirements that are not specifically required under 10 CFR 50.36(c)(5) and that are not otherwise necessary for operation of the plant in a safe manner, can be relocated from administrative controls.

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Further guidance on the relocation of such technical specifications from the plant license to licensee-controlled documents was developed by the NRC and provided in the Standard Technical Specifications (STS) for Westinghouse Plants (NUREG-1431),dated April 1995, and Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995. AL 95-06 provides specific guidance for relocating TS provisions of Reviews and Audits, Procedure Review Processes, and Records and Record Retention to the Quality Assurance Plan. Similar Technical Specification amendments have been approved in the past by the Nuclear Regulatory Commission (NRC) for other nuclear power plants including Fermi 2 of the Detroit Edison Company, and Beaver Valley 1 and 2 of the Duquesne Light Company.

**Discussion**

As a result of continuous improvement efforts, FPL proposes changes to Section 6.0 of the Turkey Point Units 3 and 4 Technical Specifications. FPL proposes to delete, revise, or clarify certain Administrative Controls Section TS provisions and relocate other Administrative Controls Section TS provisions to FPL controlled documents or programs such as the Turkey Point Units 3 and 4 Updated Final Safety Analysis Report (UFSAR).

Revision of current TS in this manner is expected to produce an improvement in the efficient use of NRC and FPL resources. In many cases the NRC requirement for provisions of certain Administrative Controls in the TS is redundant to other NRC regulations. Relocating these provisions will allow FPL to administratively control changes to these provisions without having to submit TS changes for NRC approval. By approving this amendment, the NRC will be relieving FPL of the regulatory burden and allow the NRC and FPL resources presently associated with license amendments related to Administrative Controls to be utilized more efficiently. Consequently, FPL requests that the proposed TS change receive consideration as a "Cost Beneficial Licensing Action" since a significant amount of savings, well in excess of $100,000, is expected over the remaining plant lifetime if this TS change is approved. These savings are realized from not having to prepare and submit license amendments for NRC review for the TS provisions being proposed for relocation, revision, or deletion.

The proposed changes are to relocate, revise, delete, or clarify the following provisions of the TS:

| EXISTING TS SECTION | SUBJECT | PROPOSED CHANGE |
|---|---|---|
| 6.2.2.f | Administrative Controls on Working Hours of Plant Staff | Partly delete, partly relocate within TS |
| Table 6.2-1 | Minimum Shift Crew Composition | Clarify |
| 6.2.3 | Shift Technical Advisor | Clarify |
| 6.4 | Training | Delete |
| 6.5 | Review and Audit | Relocate to UFSAR |
| 6.6 | Reportable Event Action | Partly delete, partly relocate to UFSAR |
| 6.8.2 | Review and Approval of Procedures | Relocate to UFSAR |
| 6.8.3 | Temporary Changes to Procedures | Relocate to UFSAR |
| 6.8.4.b | In-Plant Radiation Monitoring | Relocate to UFSAR |
| 6.8.4.g | Radiological Environmental Monitoring Program | Relocate to UFSAR |
| 6.10 | Record Retention | Relocate to UFSAR |
| 6.11 | Radiation Protection Program | Relocate to UFSAR |
| 6.12 | High Radiation Area | Clarify |
| 6.13 | Process Control Program (PCP) | Relocate to UFSAR |
| 6.14 | Offsite Dose Calculation Manual (ODCM) | Revise to reflect changes to 6.5 & 6.10 |

These proposed changes are consistent with the NRC guidance provided in the Final Rule 60 FR 36593, NUREG-1431, and Administrative Letter 95-06, and continue to satisfy the provisions of 10 CFR 50.36(c)(5). Furthermore, these proposed changes are consistent with the underlying principles of the NRC guidance for relocating specific and prescriptive requirements from the Technical Specifications, that are not specifically required by 10 CFR 50.36(c)(5) and not otherwise necessary to be in the TS for the safe operation of the plant.

## JUSTIFICATION OF PROPOSED AMENDMENTS

FPL proposes the following changes to the Administrative Controls Section 6.0 of the Turkey Point Units 3 and 4 Technical Specifications (TS). The changes are described in the order in which the associated TS appears in the Technical Specifications. The proposed revised Technical Specification pages are provided in Attachment 3.

1. TS INDEX

Proposed change - FPL proposes to revise the index to make editorial corrections to reflect the relocation of the following provisions from the TS: Training, Review and Audit, Reportable Event Action, Record Retention, Radiation Protection Program, and the Process Control Program. These are further described below.

2. ADMINISTRATIVE CONTROLS ON PLANT STAFF WORKING HOURS (6.2.2.f)

Proposed change - FPL proposes that the requirement for administrative controls on working hours of plant staff, currently included in Section 6.2.2.f of the TS, be replaced with a general requirement for a procedure to establish and maintain working hour limits. The four specific guidelines on working hours currently specified in Section 6.2.2.f are not required by 10 CFR 50.36(c)(5). These guidelines are already implemented by FPL plant procedures and can be removed from the TS. This proposed change to the Technical Specifications would not eliminate or revise these procedures. The proposed change simply deletes the four specific guidelines from the TS and relocates the remaining TS requirements for having administrative controls from the existing TS Section 6.2.2, "Plant Staff," to a new TS Section 6.8.5, under TS 6.8, "Procedures and Programs."

On February 18, 1982, the NRC published the "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" (47 FR 23836). In June 1982, the NRC revised the policy and subsequently disseminated the revision in Generic Letter (GL) 82-12, "Nuclear Power Plant Staff Working Hours," which recommended that licensees incorporate specific working hour limits in the TS to minimize the potential for personnel errors resulting from fatigue. The NRC subsequently determined that very few events at U.S. nuclear plants have been attributed to inadequate control of working hours, and that licensees can adequately control working hours with administrative procedures. This approach is consistent with Action Item 1.A.1.3.1, "Limit Overtime," of NUREG-0737, "Clarification of TMI Action Plan Requirements."

The underlying intent of the current Administrative Controls on plant staff working hours is to ensure that personnel performing safety related functions are physically fit to carry out these duties and responsibilities. The performance based objective is in effect to minimize the potential for errors caused by fatigue and in particular to prevent such errors from being introduced into operations and maintenance activities. FPL fully supports and is committed to this objective. Furthermore, FPL is committed to retaining administrative procedures that state this objective and control the plant staff working hours.

This change from specific working hour limits to administrative procedures to control working hours will provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation. Specific working hour limits are not otherwise required to be in the TS under 10 CFR 50.36(c)(5) and are not important to the detection, prevention, or mitigation of an event. The specific controls for working hours of plant staff are described in a FPL procedure that requires a deliberate decisionmaking process to minimize the potential for impaired personnel performance. FPL's established procedure control processes provide sufficient control for any future changes to that procedure.

With the relocation of the remaining requirement for administrative controls to Section 6.8 of the TS, any future changes to these requirements would continue to require NRC approval. The proposed TS change would allow FPL to make changes to the specific overtime hour guidelines in the future without prior NRC approval. The overall effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently.

The proposed change to relocate the remaining TS administrative controls on plant working hours from the TS Section 6.2.2.f to Section 6.8 would add a new Section 6.8.5, as follows:

"*6.8.5 Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions, e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel. The procedures shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.*

*Any deviation from the working hour guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant General Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized."*

3. SHIFT TECHNICAL ADVISOR (TABLE 6.2-1, and SECTION 6.2.3)

Proposed change - The existing TS Table 6.2-1, triple asterisk symbol (***) for the Shift Technical Advisor (STA) position, allows that the STA position can be filled with the Nuclear Plant Supervisor or the individual with a Senior Operator license meeting the qualifications for the STA as required by the NRC. Nevertheless, FPL proposes to clarify the qualifications for the STA position and clarify the combination of the required STA position and the required on-shift Senior Reactor Operator (SRO) positions as a dual role SRO/STA position.

This proposed change to clarify the qualifications for the STA position and the dual role SRO/STA position is in accordance with the recommendation of the NRC Policy Statement on Engineering Expertise on Shift, (50 FR 43621 issued on October 28, 1985) which was provided to licensees by NRC Generic Letter 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986. Similar Technical Specification amendments have been approved by the NRC for other nuclear power plants such as Limerick 1 and 2 of Philadelphia Electric Company, and Calvert Cliffs 1 and 2 of Baltimore Gas and Electric Company.

As a short-term effort for improving the ability of shift operating personnel to recognize, diagnose, and effectively deal with plant transients or other abnormal plant conditions following the accident at Three Mile Island in March 1979, each nuclear power plant was required to have a STA on duty. The STA's function is to provide engineering and accident assessment expertise to the shift in the event of abnormal or accident conditions. The STA requirement was communicated to licensees in NUREG-0578 (July 1979) and NUREG-0737, Item I.A.1.1 (November 1980). At that time the NRC intended that use of the dedicated STA position would be an interim measure only, and that it would be eliminated once the long-term initiatives were achieved.

The NRC Policy Statement on Engineering Expertise on Shift issued on October 28, 1985, provides licensees two options for meeting the STA requirement. Option 1 permits licensees to combine one of the required on-shift SRO positions with the STA position into a "dual role"(SRO/STA) position. Option 2 permits licensees to place on each shift a dedicated STA who meets the STA criteria of NUREG-0737 and assumes an active role in shift activities. The NRC Policy Statement states that either Option 1 or Option 2 may be used on each shift.

The proposed TS changes to adopt a dual role SRO/STA would have no effect on the required minimum shift crew composition. The dual-role SRO/STA position option recommended by the NRC Policy Statement on Engineering Expertise on Shift combines one of the required SRO positions and the STA position. Therefore, use of the dual-role SRO/STA position option will not result in the need to assign an additional SRO to meet minimum shift staffing requirement.

The NRC Policy Statement specifically states that the number of shift personal specified in 10 CFR 50.54(m)(2) and reflected in TS Table 6.2-1 is sufficient to allow the individual filling the dual-role SRO/STA position to provide both accident assessment expertise, and to analyze and respond to off-normal occurrences when needed. The purpose of the STA position is to ensure that engineering and accident assessment expertise is available on each shift. The NRC Policy Statement concludes that the dual-role SRO/STA position can provide this expertise and simultaneously function as one of the SROs required to meet staffing levels in 10 CFR 50.54(m)(2), and TS Table 6.2-1.

The proposed changes to combine SRO position with the STA position into a "dual role" SRO/STA position are as follows:

TS Table 6.2-1 - The triple asterisk symbol for the STA position will refer to the following note:

*"*** The STA position may be filled by the Nuclear Plant Supervisor or an individual with a Senior Operator license who meets the 1985 NRC Policy Statement on Engineering Expertise on Shift."*

TS Section 6.2.3 - The statement specifying the education requirements for the STA position in TS 6.2.3.1 will be replaced with the following:

*"The Shift Technical Advisor shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift."*

Additionally, since the Nuclear Plant Supervisor may also assume the dual role NPS/STA position as per the triple asterisk note for TS Table 6.2-1 and, therefore, cannot provide advisory technical support to himself, the words *"to the Nuclear Plant Supervisor"* are being deleted from the TS 6.2.3.1. This change has no impact on the regulatory effectiveness of TS 6.2.3 or FPL's compliance with the requirements for the STA position.

4. TRAINING (6.4)

Proposed change - FPL proposes that the requirements on training, currently included in TS Section 6.4, be deleted from the TS on the basis that they are adequately addressed by other existing regulations such as 10 CFR 50.48, 10 CFR 50 Appendix R, and 10 CFR Part 55, as implemented in other administrative controls of TS 6.0. Additionally, TS 6.2.2, "Plant Staff," which is retained, provides adequate requirements to assure an acceptable, competent operating staff. Each member of the Turkey Point Nuclear Plant staff is required to meet or exceed the minimum qualifications acceptable to the NRC staff, as specified in TS 6.2.2 and TS 6.3.1.

Therefore, FPL concludes that existing regulations and other administrative controls of TS Section 6.0 provide sufficient control of these training requirements, and TS Section 6.4 can be deleted from the Technical Specifications. Similar Technical Specification amendments have been approved by the NRC for other nuclear plants such as Fermi 2 of the Detroit Edison Company.

5. REVIEW AND AUDIT (6.5)

Proposed change - In accordance with the NRC guidance provided by Administrative Letter 95-06 for relocation of requirements related to reviews and audits, FPL proposes that the review and audit functions, currently included in Section 6.5 of the TS, be relocated intact to Chapter 12 of the UFSAR implementing 10 CFR Part 50, Appendix B.

The review and audit functions define an administrative framework to confirm that plant activities have been properly conducted in a safe manner. The reviews and audits serve also to provide a cohesive program that provides senior management with assessments of plant operation and recommends actions to improve nuclear safety and reliability. These review and audit functions are adequately addressed by existing regulations and will be committed to in Chapter 12 of the UFSAR.

FPL will continue to implement Chapter 12 of the UFSAR in accordance with the requirements of 10 CFR Part 50, Appendix B, and commitments to ANSI N18.7-1972, which provides appropriate controls for the approval of changes to the audit functions and frequencies. Changes to Chapter 12 of the UFSAR will be controlled in accordance with 10 CFR 50.54(a).

Therefore, FPL proposes that the review and audit requirements from the TS be relocated intact to Chapter 12 of the UFSAR, as summarized below:

The Plant Nuclear Safety Committee (PNSC) requirements (TS 6.5.1) are proposed to be relocated intact to Chapter 12 of the UFSAR.

The Company Nuclear Review Board (CNRB) requirements (TS 6.5.2) are proposed be relocated intact to Chapter 12 of the UFSAR.

The Technical Review and Control requirements (TS 6.5.3) are also proposed to be relocated intact to Chapter 12 of the UFSAR.

The proposed change would not eliminate or revise any of the current PNSC functions, CNRB functions, or audit requirements described in the TS. The proposed Technical Specification change would allow FPL to make changes to the review and audit functions in the future that do not involve a reduction in commitment without prior NRC approval in accordance with 10 CFR 50.54(a). The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently.

TS 6.7.1 is proposed to be revised to reflect relocation of CNRB function from the TS to Chapter 12 of the UFSAR. The proposed wording for TS Section 6.7.1, on TS page 6-12, will be to spell out CNRB as *"...Company Nuclear Review Board (CNRB)"* for its first time use in the TS.

TS 6.14.2 is proposed to be revised to reflect relocation of PNSC functions from the TS to Chapter 12 of the UFSAR. The proposed change for TS Section 6.14.2.b on TS page 6-26 will be to remove the words *"the review and acceptance by the PNSC and"*. TS Section 6.14.2.b will then read, *" Shall become effective after approval of the Plant General Manager; and"*.

Additionally, the requirement for PNSC to review changes to the Offsite Dose Calculation Manual (ODCM) is included in the above provisions being relocated to the UFSAR.

6. REPORTABLE EVENT ACTION (6.6)

Proposed change - FPL proposes to delete TS Section 6.6.1.a, as it is redundant to the existing requirements of 10 CFR 50.73.

FPL also proposes to relocate the PNSC review of reportable event action requirement, currently included in TS 6.6.1.b, to Chapter 12 of the UFSAR. This review requirement is redundant to the PNSC review responsibility currently listed as item 6.5.1.6.f which is being relocated to the UFSAR as discussed in Section 5 above. The TS 6.6.1.b requirements for submitting the results of the review of reportable events to the CNRB and the President-Nuclear Division are also redundant to other requirements in Section 6. Specifically Section 6.5.1.8 (which is also being relocated to the UFSAR as discussed above) ensures that records of PNSC reviews are provided to the CNRB and the President-Nuclear Division. Therefore, there is no need to duplicate these responsibilities in the TS. FPL, therefore, concludes that the PNSC responsibilities section in Chapter 12 of the UFSAR will provide sufficient control of this reportable event action requirement, thereby allowing for the removal of TS 6.6.1.b from the Technical Specifications.

7. PROCEDURES AND PROGRAMS (6.8.2 and 6.8.3)

Proposed change - In accordance with the NRC guidance provided by Administrative Letter 95-06 for relocation of requirements related to the review and approval of procedures and changes to procedures, FPL proposes to relocate the review and approval requirement for changes (including temporary changes) to procedures of Specification 6.8.1, currently included in TS Section 6.8.2 and 6.8.3, from the TS to Chapter 12 of the UFSAR. This proposal is based on already existing regulatory requirements, as follows.

The requirement for procedure control is mandated by 10 CFR 50, Appendix B, Criterion V and Criterion VI. Turkey Point Nuclear Plant has committed to follow ANSI N18.7-1972 as a means to comply with 10 CFR 50, Appendix B. ANSI N18.7-1972, Section 5.1.2 discusses procedure adherence. This section clearly states that procedures shall be followed, and the requirements for use of procedures shall be prescribed in writing. ANSI N18.7-1972, Section 5.4 describes the review and approval of procedures. This section further states that each procedure shall be reviewed and approved prior to initial use and periodically thereafter.

The provisions in Chapter 12 of the UFSAR will implement the NRC regulations pertaining to the control of documents such as instructions, procedures, and drawings, including changes thereto. The procedure review and approval functions currently in TS define an administrative framework to ensure that documents are reviewed for adequacy and approved for release by authorized personnel. The required control of these processes in the regulations and the revised UFSAR is considered to be redundant and functionally equivalent to the provisions currently in TS. Therefore, FPL has determined that the procedure review and approval functions are adequately addressed by existing regulations and will be committed to in the UFSAR. Based upon the relocation of the procedure review provisions to the UFSAR, it is not necessary to maintain redundant or additional requirements in the TS administrative controls.

FPL proposes to continue to implement the requirements of 10 CFR 50, Appendix B, regarding administrative procedures without duplicating the procedure review and approval requirements in the TS, as provisions related to administrative procedures are not necessary in the TS to assure the safe operation of the plant. Additionally, FPL will continue to implement Chapter 12 of the UFSAR in accordance with the requirements of 10 CFR 50, Appendix B, which provides appropriate controls for the review and approval of procedure changes. Also, Turkey Point Nuclear Plant's commitment to ANSI N18.7-1972 is unaffected by relocating TS 6.8.2 and TS 6.8.3 requirements to Chapter 12 of the UFSAR.

With the relocation to the UFSAR, any changes to the review and approval process for administrative procedures in the future would be subject to review in accordance with 10 CFR 50.54(a), to ensure that the underlying purpose of the review and approval process for administrative procedures would be retained. The process also ensures that changes to the process would be documented and included in the UFSAR revisions that are submitted to the NRC as required by 10 CFR 50.71(e) and 10 CFR 50.54(a).

The proposed Technical Specification change would allow FPL to make changes to the review and approval processes for administrative procedures in the future, without prior NRC approval in accordance with 10 CFR 50.54(a). The required evaluations described above, would appropriately limit the extent of such changes and provide assurance that the safety objective of having an effective review and approval processes for administrative procedures would still be met. The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently.

Also, the NRC recommended relocation of these requirements in Administrative Letter 95-06. FPL concludes that these regulatory requirements provide sufficient control of these provisions thereby allowing for the relocation of TS 6.8.2 and 6.8.3 from the Technical Specifications to the UFSAR. The TS requirements will be relocated intact to Chapter 12 of the UFSAR.

8. IN-PLANT RADIATION MONITORING (6.8.4.b)

Proposed change - FPL proposes to relocate the In-Plant Radiation Monitoring Program requirements, currently included in TS Section 6.8.4.b, from the TS to Chapter 11 of the UFSAR. The In-Plant Radiation Monitoring Program provides controls to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. However, the In-Plant Radiation Monitoring Program is not specifically required by 10 CFR 50.36(c)(5) and not otherwise necessary to be in the TS for the safe operation of the plant. Therefore, as per the NRC guidance documents discussed earlier, it can be relocated from the TS to the UFSAR.

The In-Plant Radiation Monitoring Program administrative control does not involve monitoring process variables that are initial conditions for a design basis transient or accident, nor does it involve a primary success path to mitigate a design basis accident. These provisions do not satisfy the criteria for inclusion in the TS. Therefore, these provisions can be relocated to the UFSAR, and 10 CFR 50.59 provides adequate control for future changes to the Program.

With the relocation to the UFSAR, any changes to the In-Plant Radiation Monitoring Program requirements in the future would be subject to review in accordance with 10 CFR 50.59, to confirm that they do not involve an unreviewed safety question. In effect, this safety evaluation would ensure that the underlying purpose of the In-Plant Radiation Monitoring Program requirements is retained. The process also ensures that the changes would be documented and included in the UFSAR revisions and the Safety Evaluation Summary Reports that are submitted to the NRC as required by 10 CFR 50.71(e) and 10 CFR 50.59(b).

The proposed Technical Specification change would allow FPL to make changes to the In-Plant Radiation Monitoring Program in the future, without prior NRC approval in accordance with 10 CFR 50.59. The required safety evaluations described above, however, would appropriately limit the extent of such changes and provide assurance that the safety objective of having an effective In-Plant Radiation Monitoring Program would still be met.

The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently. Therefore, based on these considerations, FPL concludes that the In-Plant Radiation Monitoring Program administrative control is not necessary in the TS to assure operation of the plant in a safe manner and can be relocated from the TS to Chapter 11 of the UFSAR.

9. RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (6.8.4.g)

Proposed change - FPL proposes to relocate the Radiological Environmental Monitoring Program, currently included in TS Section 6.8.4.g, to Chapter 11 of the UFSAR. The Radiological Environmental Monitoring Program requires that procedures be prepared for monitoring the radiation and radionuclides in the environs of plants, consistent with the guidance specified in 10 CFR Part 50, Appendix I. However, the Radiological Environmental Monitoring Program is not specifically required by 10 CFR 50.36(c)(5) and not otherwise necessary to be in the TS for the safe operation of the plant. Therefore, as per the NRC guidance documents discussed earlier, it can be relocated to the UFSAR.

The Radiological Environmental Monitoring Program provides controls to monitor radiation and radionuclides in the environs of the plant. This program was developed to identify potential exposure pathways and verify the accuracy of the plant's effluent monitoring program. The Program is a redundant verification of the effectiveness of the effluent monitoring program contained in the ODCM. The provisions of the TS for the Radiological Environmental Monitoring Program do not satisfy the criteria for TS content for inclusion elsewhere in the TS, nor are these provisions required to be in the TS under 10 CFR 50.36(c)(5). Therefore, the requirements in 10 CFR 50.59, 10 CFR 20.1302, 40 CFR Part 190, and 10 CFR Part 50, Appendix I, provide sufficient control of these TS provisions to allow relocation to the UFSAR.

With the relocation to the UFSAR, any changes to the Radiological Environmental Monitoring Program requirements in the future would be subject to review in accordance with 10 CFR 50.59, to confirm that they do not involve an unreviewed safety question. The safety evaluation would ensure that the underlying purpose of the Radiological Environmental Monitoring Program requirements would be retained. The process also ensures that the changes would be documented and included in the UFSAR revisions and the Safety Evaluation Summary Reports that are submitted to the NRC as required by 10 CFR 50.71(e) and 10 CFR 50.59(b).

The proposed Technical Specification change would allow FPL to make changes to the Radiological Environmental Monitoring Program requirements in the future, without prior NRC approval in accordance with 10 CFR 50.59. The required safety evaluations described above, however, would appropriately limit the extent of such changes and provide assurance that the safety objective of having an effective Radiological Environmental Monitoring Program, would still be met. The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently. Therefore, based on these considerations, FPL concludes that the Radiological Environmental Monitoring Program requirements are not necessary in the TS to assure operation of the plant in a safe manner and can be relocated from the TS to Chapter 11 of the UFSAR.

10. RECORD RETENTION (6.10)

Proposed change - In accordance with the NRC guidance provided by Administrative Letter 95-06 for relocation of requirements related to records or record retention, FPL proposes to relocate the requirements on record retention included in TS Section 6.10 from the TS to Chapter 12 of the UFSAR without any changes.

The provisions in Chapter 12 of the UFSAR will implement the NRC regulations pertaining to the maintenance of records related to activities affecting quality. The required controls related to record retention specified in various regulations and the provision to be incorporated into the UFSAR are considered to be redundant to the requirements currently in TS. The record retention requirements are adequately addressed by existing regulations and will be committed to in the UFSAR. It is not necessary to maintain redundant or additional requirements in the TS administrative controls.

The regulatory requirements under 10 CFR Part 50, Appendix B, provide sufficient control of the plant records, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a). In addition, other regulations such as 10 CFR Part 20, Subpart L, and 10 CFR 50.71 require the retention of certain records related to operation of the nuclear plant. These regulatory requirements provide sufficient control of these recordkeeping provisions and can be removed from the TS.

With the relocation to Chapter 12 of the UFSAR, any changes to these record retention requirements in the future would be subject to review in accordance with 10 CFR 50.54(a), to confirm

that they do not involve a reduction in commitment without prior NRC approval. In effect, this would ensure that the underlying purpose of the record retention requirements would be retained. The process also ensures that the changes would be documented and included in the UFSAR revisions and the description of UFSAR changes that are submitted to the NRC as required by 10 CFR 50.71(e) and 10 CFR 50.54(a).

The proposed Technical Specification change would allow FPL to make changes to the record retention requirements in the future, without prior NRC approval in accordance with 10 CFR 50.54(a). The required evaluation would appropriately limit the extent of such changes and provide assurance that the safety objective of having effective record retention requirements would still be met. The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently. Therefore, based on these considerations, FPL concludes that the record retention requirements are not necessary in the TS to assure operation of the plant in a safe manner and can be relocated from the TS to the UFSAR. The record retention requirements currently included in Section 6.10 of the TS will be relocated intact to the UFSAR. In addition, FPL proposes to revise the following TS pages to reflect relocation of the record retention requirements from the TS to the UFSAR:

TS 4.7.6.g (Page 3/4 7-21). The proposed change to the last sentence of the first paragraph of TS Surveillance Requirement 4.7.6.g, "Snubber Service Life Monitoring Program" will be to remove the words, "*... as required by Specification 6.10.3m.*"

TS 6.14.2.a (Page 6-26). The proposed change to TS 6.14.2.a will be to remove the words, "*... as required by Specification 6.10.3q.*"

11. RADIATION PROTECTION PROGRAM (6.11)

Proposed change - FPL proposes to relocate the requirements for the Radiation Protection Program, currently included in TS Section 6.11, from the TS to Chapter 11 of the UFSAR. The existing TS for the Radiation Protection Program requires procedures to be prepared for personnel radiation protection consistent with the requirements of 10 CFR 20. The requirement to have procedures to implement 10 CFR 20 is also contained in 10 CFR 20.1101(b). Periodic review of these procedures is addressed under 10 CFR 20.1101(c). However, the Radiation Protection Program is not specifically required by 10 CFR 50.36(c)(5) and

not otherwise necessary to be in the TS for the safe operation of the plant. Therefore, as per the NRC guidance documents discussed earlier, it can be relocated from the TS to the UFSAR.

With its relocation to Chapter 11 of the UFSAR, any changes to the Radiation Protection Program requirements in the future would be subject to review in accordance with 10 CFR 50.59, to confirm that they do not involve an unreviewed safety question. In effect, this safety evaluation would ensure that the underlying purpose of the Radiation Protection Program requirements would be retained. The process also ensures that the changes would be documented and included in the UFSAR revisions and the Safety Evaluation Summary Reports that are submitted to the NRC as required by 10 CFR 50.71(e) and 10 CFR 50.59(b).

The proposed Technical Specification change would allow FPL to make changes to the Radiation Protection Program requirements in the future, without prior NRC approval in accordance with 10 CFR 50.59. The required safety evaluations described above, however, would appropriately limit the extent of such changes and provide assurance that the safety objective of having effective Radiation Protection Program requirements would still be met. The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently. FPL concludes that the Radiation Protection Program requirements can be relocated from the TS to Chapter 11 of the UFSAR.

12. HIGH RADIATION AREA (6.12)

Proposed change - FPL proposes to clarify the description of a high radiation area in TS Section 6.12.1 by adding the words "greater than 100 mrem/hr but" before "equal to or less than." The new wording will describe an area as a high radiation area in which the intensity of radiation is greater than 100 mrem/hr but equal to or less than 1000 mrem/hr at 30 cm (12 inches) from the radiation source. Additionally, the last sentence on TS Page 6-24 "Any individual or group..." will start a new paragraph to make it consistent with the Standard Technical Specifications.

These changes are purely administrative in nature and are being proposed to clarify the description of a high radiation area in the TS, and to make it consistent with the description provided in the Standard Technical Specifications (STS) for Westinghouse Plants (NUREG-1431),dated April 1995.

13. PROCESS CONTROL PROGRAM (PCP) (6.13)

Proposed change - FPL proposes to relocate the Process Control Program (PCP) approval and revision process requirements, currently included in TS Section 6.13, from the TS to Chapter 12 of the UFSAR. The PCP, which implements requirements of 10 CFR Part 20, 10 CFR Part 61, and 10 CFR Part 71, is not specifically required by 10 CFR 50.36(c)(5) and not otherwise necessary to be in the TS for the safe operation of the plant. Therefore, as per the NRC guidance documents discussed earlier, it can be relocated from the TS to the UFSAR. The regulatory requirements under 10 CFR Part 50, Appendix B, provide sufficient control of the PCP, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a).

With the relocation to Chapter 12 of the UFSAR, any changes to the PCP requirements in the future would be subject to review in accordance with 10 CFR 50.54(a), to confirm that they do not involve a reduction in commitment without prior NRC approval. In effect this would ensure that the underlying purpose of the PCP requirements would be retained. The process also ensures that the changes would be documented and included in the UFSAR revisions and the description of UFSAR changes that are submitted to the NRC as required by 10 CFR 50.71(e) and 10 CFR 50.54(a).

The proposed Technical Specification change would allow FPL to make changes to the PCP programmatic requirements in the future, without prior NRC approval in accordance with 10 CFR 50. 54(a). The required evaluation would appropriately limit the extent of such changes and provide assurance that the safety objective of having an effective PCP would still be met. The net effect of this Technical Specification change, therefore, is that the safety of plant operation is unaffected and the FPL and NRC resources associated with processing license amendments in the future are utilized more efficiently. FPL concludes that the PCP requirements currently included in Section 6.13 of the TS can be relocated intact to Chapter 12 of the UFSAR.

14. OFFSITE DOSE CALCULATION MANUAL (ODCM) (6.14)

Proposed change - FPL proposes to revise TS Section 6.14.2.a and 6.14.2.b to delete references to Specification 6.10.3q and the PNSC, respectively, to be consistent with the proposed deletion of TS Sections 6.10 and 6.5.1, as stated above.

# ATTACHMENT 2

## NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

### Introduction

The Nuclear Regulatory Commission has provided criteria in 10 CFR §50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a plant involves no significant hazards consideration, if operation of the plant 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.

The proposed changes to the subject Technical Specifications include relocation, revision or deletion of the following TS provisions: Administrative Controls on Plant Staff Working Hours, Shift Technical Advisor, Training, Review and Audit, Reportable Event Action, Review and Approval of Procedures, Temporary Changes to Procedures, In-Plant Radiation Monitoring, Radiological Environmental Monitoring Program, Record Retention, Radiation Protection Program, High Radiation Area, Process Control Program, and Offsite Dose Calculation Manual. In accordance with 10 CFR 50.92(c), FPL has made a determination that the proposed amendments involve no significant hazards considerations. Each criterion for determining the no significant hazards consideration is discussed below for the proposed amendments.

### Discussion

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

The proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed changes are administrative in nature. These proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated because they 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. None of the proposed changes involve a physical modification to the plant, a new mode of operation or a change to the UFSAR transient analyses. No Limiting Condition for Operation, ACTION statement

or Surveillance Requirement is affected by any of the proposed changes. Also, these proposed changes, in themselves, do not reduce the level of qualification or training such that personnel requirements would be decreased. Further, the proposed changes do not alter the design, function, or operation of any plant component. Therefore, the proposed changes do not affect the probability or consequences of accidents previously evaluated.

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

The proposed changes do 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 do not affect assumptions contained in plant safety analyses, the physical design and/or modes of plant operation defined in the plant operating license, or Technical Specifications that preserve safety analysis assumptions. The proposed changes do not introduce a new mode of plant operation or surveillance requirement, nor involve a physical modification to the plant. The proposed changes are administrative in nature. The changes propose to revise, delete, or relocate the stated administrative control provisions from the TS to the UFSAR whereby adequate control of information is maintained. Furthermore, the proposed changes do not alter the design, function, or operation of any plant components. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes do not involve a significant reduction in a margin of safety because they are administrative in nature. The operating limits and functional capabilities of the affected systems, structures, and components are unchanged by the proposed amendments. None of the proposed changes involve a physical modification to the plant, a new mode of operation or a change to the UFSAR transient analyses. No Limiting Condition for Operation, ACTION statement, or Surveillance Requirement is affected. Additionally, the proposed changes do not alter the scope of equipment currently required to be OPERABLE or subject to surveillance testing, nor does the proposed change affect any instrument setpoints or equipment safety functions. Therefore, the change does not involve a significant reduction in a margin of safety.

Based on the above discussion, FPL has determined that the proposed 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, (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(c).

ENVIRONMENTAL IMPACT

FPL has reviewed the proposed Technical Specification changes against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. FPL concludes that the proposed Technical Specifications changes meet the criteria set forth in 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an environmental impact statement or environmental assessment, as this request proposes changes to record keeping, reporting, or administrative procedures or requirements. Therefore, pursuant to 10 CFR 51.22(b) an environmental impact statement or an environmental assessment is not required.

CONCLUSION

Based on the evaluations above: (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 NRC regulations, and the proposed amendment will not be inimical to the common defense and security, or the health and safety of the public.