



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 201 TO FACILITY OPERATING LICENSES NO. DPR-31  
AND AMENDMENT NO. 195 TO FACILITY OPERATING LICENSES NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT PLANT, UNITS 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated March 8, 1999, Florida Power and Light Company (FPL or the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Plant, Units 3 and 4. The proposed amendments would revise TS Section 6.0, Administrative Controls, by removing requirements that are adequately controlled by existing regulations other than Title 10, Code of Federal Regulations, (10 CFR), Section 50.36, and the TS. The amendments would also relocate selected requirements from TS Section 6.0 to licensee-controlled documents or programs (e.g., the updated final safety analysis report (UFSAR) or the quality assurance plan). Guidance on the proposed changes was developed by the U.S. Nuclear Regulatory Commission (NRC or Commission) and provided in the Standard Technical Specifications (STS) for Westinghouse Plants, NUREG-1431, and Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to propose technical specifications to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation 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. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has adopted amendments to 10 CFR 50.36 (Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995)), which revised the rule 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 Commission noted that the staff also had used the intent of these criteria to identify the optimum set of administrative controls in the TS (60 FR 36957).

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Title 10, Code of Federal Regulations, Section 50.36 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, that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff 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 facility in a safe manner, can be removed from administrative controls.

### 3.0 EVALUATION

The following discussions detail the NRC staff's conclusions regarding the removal or relocation of selected administrative controls from the Turkey Point TS. Most of the changes were reviewed in accordance with the guidance provided in the Standard TS, NUREG-1431. In addition, these changes were reviewed in accordance with the guidance provided in Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," issued on December 12, 1995.

The licensee submitted a revision to the TS index with the proposed changes. The changes to the index are administrative in nature and are acceptable.

In approving the proposed action, the staff relied upon FPL's commitment to relocate the selected requirements from TS Section 6.0 into certain licensee-controlled documents within 90 days from the date of these amendments, as described in FPL's application dated March 8, 1999, and evaluated in this safety evaluation. The information related to the commitment that FPL agreed to and provided in the March 8, 1999, letter is incorporated in the paragraphs of the amendments that describe the changes and the implementation of the amendments.

#### a. Administrative Controls on Plant Staff Working Hours (TS 6.2.2.f)

The licensee has proposed that the requirement for administrative controls on working hours of plant staff in TS 6.2.2.f be replaced with a general requirement for a procedure to establish and maintain working hour limits.

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 staff subsequently determined that 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 I.A.1.3.1, "Limit Overtime," of NUREG-0737, "Clarification of TMI [Three Mile Island] Action Plan Requirements."

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 staff concludes that the specific controls for working hours of reactor plant staff can be described in a licensee procedure that requires a deliberate decision-making process to minimize the potential for impaired personnel performance, and that the licensee's established procedure control processes will provide sufficient control for changes to that procedure. Therefore, the staff finds that this change to TS 6.2.2.f is acceptable.

The proposed change to relocate the remaining TS on administrative controls of working hours from TS 6.2.2.f to TS 6.8.5 is acceptable. TS 6.8.5 would then read as follows:

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.

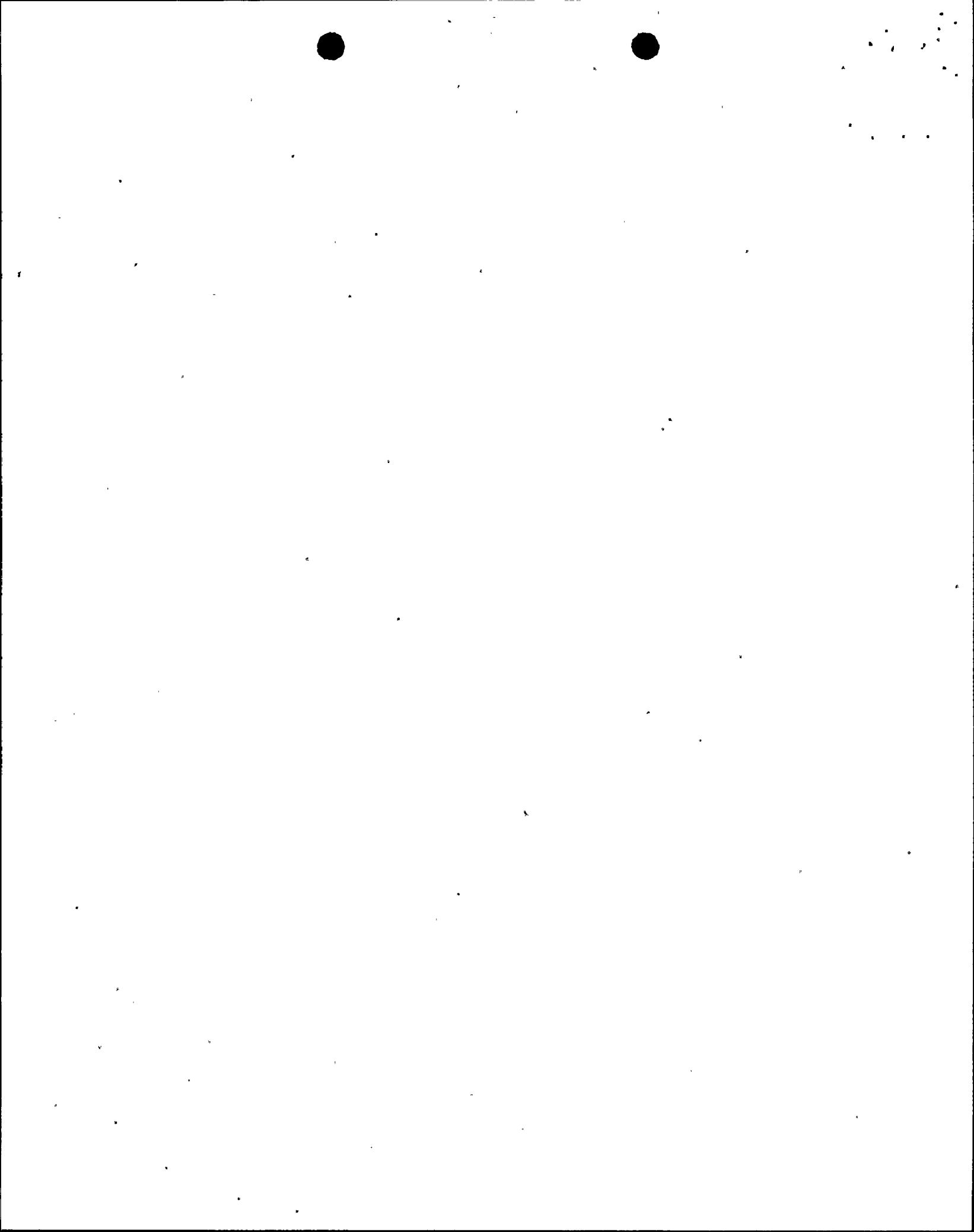
Any deviation from the working hour guidelines shall be authorized by the applicable department manager or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual 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.

The staff notes that the proposed TS amendment specifies that deviations from the guidelines shall be authorized by the applicable department manager or higher levels of management. Whereas the proposed wording differs from the Commission's policy that deviations shall be authorized by the plant manager, his deputy, or higher levels of management, the staff considers the proposed wording to be consistent with the intent of the policy to provide review by a high level of management. Turkey Point procedure requires that variation from specific working hour limits be authorized by the Site Vice President or his designee.

b. SHIFT TECHNICAL ADVISOR (STA) (TS Table 6.2-1 and TS 6.2.3)

FPL proposes to combine one of the required on-shift senior reactor operator (SRO) positions with the STA position into a "dual role" (SRO/STA) position 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 GL 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986.

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 requirements.



The NRC Policy Statement specifically states that the number of shift personnel 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. Therefore, the staff finds that this change is acceptable.

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

1. The footnote referred to by the triple asterisk in TS Table 6.2-1 will be modified to read:

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.

2. The second sentence in TS 6.2.3 specifying the education requirement will be modified to read:

The shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Experience on shift.

In addition the phrase "to the Nuclear Plant Supervisor" will be deleted from the first sentence in TS 6.2.3.

Based on its review, the staff finds that the above changes are acceptable.

c. Training (TS 6.4)

FPL proposed to delete the training requirements in TS 6.4 on the basis that they are adequately addressed by regulations such as 10 CFR 50.48, 10 CFR 50 Appendix R, and 10 CFR Part 55. The retained administrative controls in TS 6.2.2 and TS 6.3.1 on "Unit Staff Qualifications" provide adequate requirements to assure a competent operating staff.

Based on its review, the NRC staff concludes that the regulatory requirements in 10 CFR Part 55 provide sufficient controls for the training provisions and removing them from TS 6.4 is acceptable.

d. Review and Audit (TS 6.5)

FPL proposed that the review and audit function included in TS 6.5 be relocated without change to Chapter 12 of the UFSAR that implements 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 relocated to 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 American National Standards Institute (ANSI) N18.7-1972. Changes to Chapter 12 of the UFSAR will be controlled in accordance with 10 CFR 50.54(a).

The proposed changes would not eliminate or revise any of the current Plant Nuclear Safety Committee (PNSC) functions, Company Nuclear Review Board functions, or audit requirements described in the TS. The proposed TS changes 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). Therefore, the staff concludes that the regulations provide sufficient control for the audit functions and frequencies, so that removing these requirements from the TS is acceptable.

The proposed TS changes are as follows:

1. TS 6.5 "REVIEW AND AUDIT" will be relocated without change to Chapter 12 of the UFSAR. This includes TS 6.5.1 "PLANT NUCLEAR SAFETY COMMITTEE (PNSC)," TS 6.5.2 "COMPANY NUCLEAR REVIEW BOARD (CNRB)," and TS 6.5.3 "TECHNICAL REVIEW AND CONTROL." PNSC review of changes to the Offsite Dose Calculation Manual continues to be required by the portion of TS 6.5.1 that is relocated without change to Chapter 12 of the UFSAR.
2. TS 6.7.1 is revised to reflect the spelling out of "CNRB" as "Company Nuclear Review Board (CNRB)" for its first time-use in the TS.
3. TS 6.14.2.b is revised to remove the phrase "the review and acceptance by the PNSC and." TS 6.14.2.b will then read, "Shall become effective after approval of the Plant General Manager; and."

Based on its review, the staff finds that the above changes are acceptable.

e. Reportable Event Action (TS 6.6)

FPL proposed that the requirement in TS 6.6.1.a, concerning the notification of the Commission of all reportable events, be deleted from the TS on the basis that this requirement is adequately addressed in 10 CFR 50.73.

In addition, FPL proposed to relocate TS 6.6.1.b, concerning the PNSC review of reportable event action requirement, to Chapter 12 of the UFSAR. This review requirement is redundant to the PNSC review responsibility currently listed as TS 6.5.1.6.f, which is also being relocated to the UFSAR as discussed above. Therefore, the staff concludes that these reporting requirements are sufficient and removing the duplicative reporting requirements from the TS is acceptable.



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f. Procedures and Programs (TS 6.8)

FPL proposed to relocate, intact, the requirements of TS 6.8.2 and TS 6.8.3 for the review and approval process of changes to procedures (including temporary changes) to Chapter 12 of the UFSAR. This proposal is based on already existing regulatory requirements in 10 CFR Part 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 Part 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.

FPL proposes to continue to implement the requirements of 10 CFR Part 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 Part 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.

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).

FPL will continue to implement a Quality Assurance Plan in accordance with the requirements of 10 CFR Part 50, Appendix B, which provides appropriate controls for the review and approval of procedure changes. The staff concludes that these regulatory requirements provide sufficient control of these provisions and relocating them intact from the TS to Chapter 12 of the UFSAR is acceptable. Future changes to the review and approval process for procedure changes can be adequately controlled under 10 CFR 50.54(a).

g. In-Plant Radiation Monitoring (TS 6.8.4.b)

FPL proposes to relocate the requirements in TS 6.8.4.b, "In-Plant Radiation Monitoring Program requirements," 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, 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.

Based on its review, the staff concludes that these provisions may be relocated to the UFSAR, and that 10 CFR 50.59 provides adequate control for future changes to In-Plant Radiation Monitoring Program.

h. Radiological Environmental Monitoring Program (TS 6.8.4.g)

FPL proposed to relocate the requirements in existing TS 6.8.4.g related to the Radiological Environmental Monitoring Program to Chapter 11 of the UFSAR.

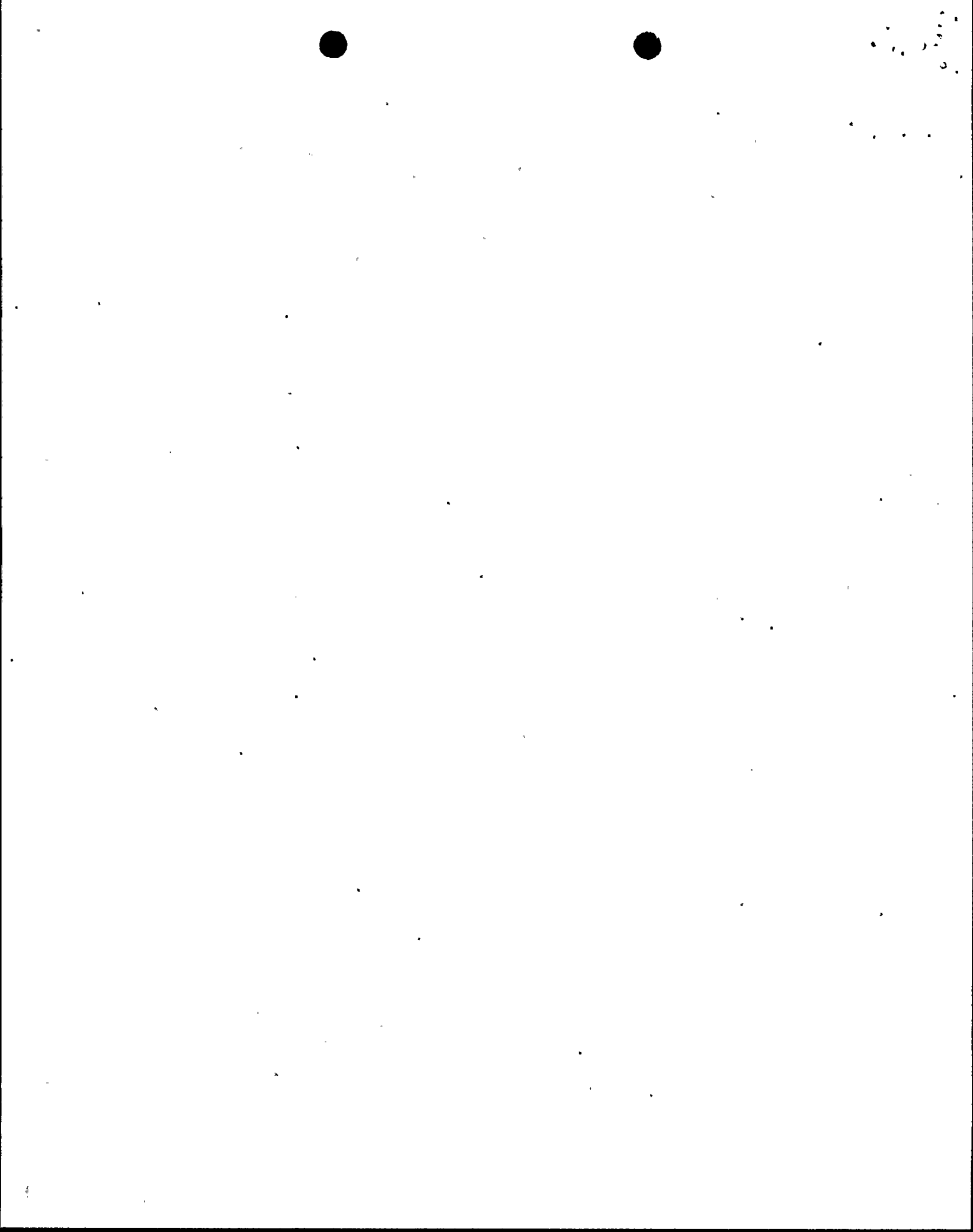
The Radiological Environmental Monitoring Program requires that procedures be prepared for monitoring the radiation and radionuclides in the environs of plants, consistent with the guidance specified in 10 CFR Part 50, Appendix I. The program is a redundant verification of the effectiveness of the effluent monitoring program contained in the Offsite Dose Calculation Manual (ODCM). With its relocation to the UFSAR, any changes to the Radiological Environmental Monitoring Program requirements would be subject to review in accordance with 10 CFR 50.59. This ensures that any future changes would be evaluated to confirm that they do not involve an unreviewed safety question. The process also ensures that the changes would be documented and included in a UFSAR revision and the Safety Evaluation Summary Reports that are submitted to the NRC pursuant to 10 CFR 50.71(e) and 10 CFR 50.59(b).

The staff concludes that 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 staff concludes that 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 provisions and relocating them from the TS to the UFSAR is acceptable.

i. Record Retention (TS 6.10)

FPL proposed that the requirements for record retention in TS 6.10 be relocated to Chapter 12 of the UFSAR without any changes, because they are adequately addressed by 10 CFR Part 50, Appendix B.

The provisions in Chapter 12 of the UFSAR will implement the Commission's 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 provisions incorporated into the UFSAR are considered to be redundant to the requirements in the TS. The staff has determined that record retention requirements are adequately addressed by existing regulations and the related commitments. Based upon the relocation of the record retention provisions to Chapter 12 of the UFSAR, it is not necessary to include redundant or additional requirements in the TS administrative controls.



The staff concludes that 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, numerous 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. The staff concludes that these regulatory requirements provide sufficient control of these recordkeeping provisions and relocating them intact from the TS to Chapter 12 of the UFSAR is acceptable.

To reflect the relocation of the record retention to the UFSAR, the following changes have to be made to TS 4.7.6.g and TS 6.14.2.a to remove the phrases "as required by Specification 6.10.3m" and "as required by Specification 6.10.3g" respectively. These changes are acceptable.

j. Radiation Protection Program (TS 6.11)

FPL proposed to relocate the requirements in TS 6.11, "Radiation Protection Program" 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 Part 20. The requirement for procedures to implement Part 20 is also contained in 10 CFR 20.1101(b). Periodic review of these procedures is addressed under 10 CFR 20.1101(c). With its relocation to the UFSAR, any changes to the Radiation Protection Program requirements would be subject to review in accordance with 10 CFR 50.59. This ensures that any future changes would be evaluated to confirm that they do not involve an unreviewed safety question. The process also ensures that any changes would be documented and included in a UFSAR revision and the Safety Evaluation Summary Reports that are submitted to the NRC pursuant to 10 CFR 50.71(e) and 10 CFR 50.59(b). The staff concludes that the provisions of the TS for the Radiation Protection 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 for the Radiation Protection Program do not have to be controlled by TS, changes to the Radiation Protection Program are adequately controlled by 10 CFR Part 20, 10 CFR 50.54, 10 CFR 50.59, and 10 CFR Part 50, Appendix B, and relocating them from the TS to the UFSAR is acceptable.

k. High Radiation Area (TS 6.12)

FPL proposed to clarify the description of a high radiation area in TS 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 starting with "Any individual or group" will be made a new paragraph. These changes are purely administrative in nature, to make TS 6.12 consistent with the description provided in the STS for Westinghouse Plants, NUREG-1431, dated April 1995.

Based on its review, the staff finds that these changes are acceptable.

I. Process Control Program (TS 6.13)

FPL proposed to relocate TS 6.13, "Process Control Program" (PCP) to Chapter 12 of the UFSAR. The PCP, which implements the 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). The approval and revision process of the PCP is adequately controlled under the 10 CFR Part 50, Appendix B, and changes to the program are controlled by 10 CFR 50.54(a).

The staff concludes that 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), such that removing these provisions from the TS is acceptable.

m. Offsite Dose Calculation Manual (ODCM) (TS 6.14)

FPL proposes to revise TS 6.14.2.a and 6.14.2.b to delete references to TS 6.10.3q and the PNSC, respectively. The revision is required to make TS 6.14 consistent with the deletion of TS 6.10 and 6.5.1, as discussed above.

Based on its review, the staff finds that the revision is acceptable

n. Summary

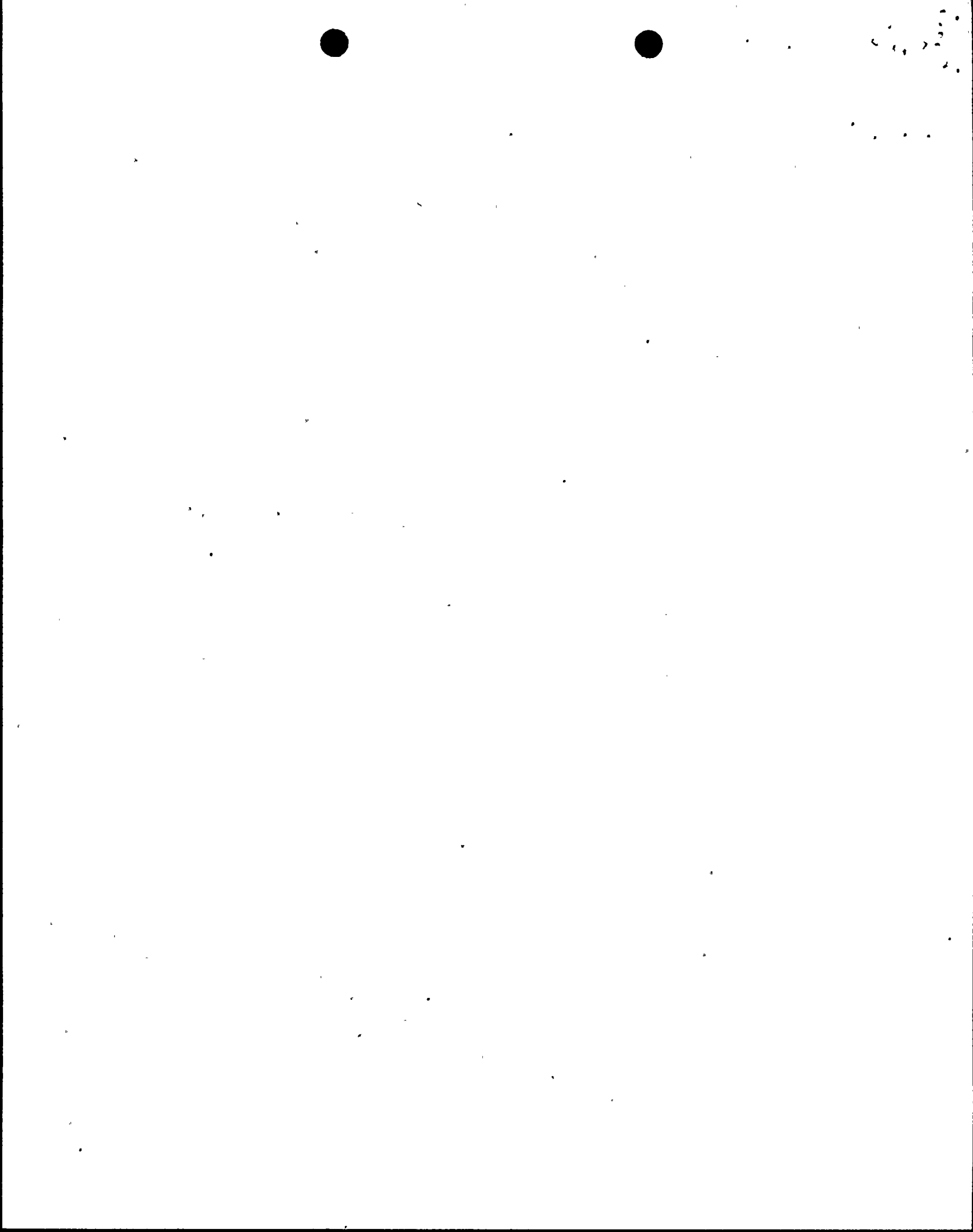
In summary, the existing TS requirements relating to administrative controls that have been deleted or relocated are not required to be in the TS under 10 CFR 50.36 or Section 182a of the Atomic Energy Act, are governed by other regulations such as 10 CFR Part 20, 10 CFR 50.4, 50.47, 50.48, 50.54, 50.55, 50.59, 50.71, 50.72, 50.73, Part 50 Appendix A, Part 50 Appendix B, Part 50 Appendix E, Part 50 Appendix I, Part 55, Part 73, or 40 CFR Part 190 and therefore are not necessary to the safe operation of the facility. Thus, the relocated provisions do not meet the intent of the four criteria described in the Commission's regulations in 10 CFR 50.36(c)(2). In addition, the staff finds that sufficient regulatory controls exist under 10 CFR 50.59 and 50.54(a) to control future changes to the relocated provisions. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the above-specified documents. Finally, the staff concludes that the administrative control requirements remaining in the TS satisfy the license content specified in 10 CFR 50.36(c)(5).

4.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. Nuclear Regulatory Commission, the State of Florida does not desire notification of issuance of license amendments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in the recordkeeping, reporting, and administrative procedures requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no



environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

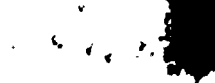
#### 6.0 CONCLUSION

Based on the staff evaluation in Section 3.0 above, the staff concludes that the proposed Technical Specification changes are acceptable.

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

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Date: October 6, 1999





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