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FROM: Florida Power & Light Co Miami, Fla. 33101 R.E. Uhrig			DATE OF DOC 7-2-75	DATE REC'D 7-10-75	LTR XX	TWX	RPT	OTHER
TO: Mr. Daniel R. Muller			ORIG 3 signed	CC 37	OTHER	SENT NRC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 40	DOCKET NO: <u>50-250</u> /251			

DESCRIPTION: Ltr notarized 7-2-75 requesting an official change in Sect. 5.1 of the Turkey Pt. Enviro Tech Specs involving only a change in existing wording & not a change in the original intent of the words & trans the following:

ENCLOSURES: Attachment A consisting of change to the wording of the present Enviro Tech Specs....

(40 cys encl rec'd)

Do Not Remove

ACKNOWLEDGED

PLANT NAME: Turkey Pt. Units 3 & 4

FOR ACTION/INFORMATION

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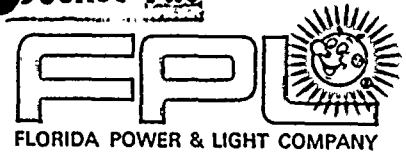
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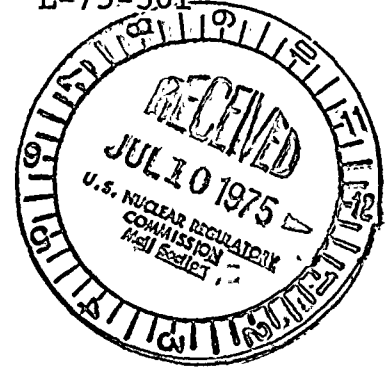
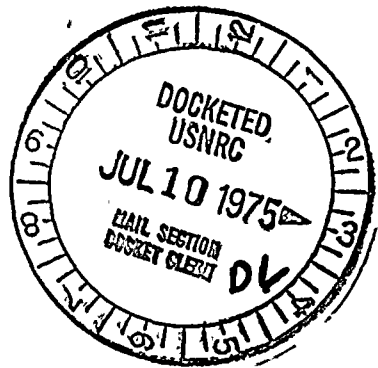
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July 2, 1975
L-75-301



Mr. Daniel R. Muller, Assistant Director
for Environmental Projects
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Muller:

Re: Turkey Point Units 3 & 4
Docket Nos. ~~50-250~~ & 50-251
Environmental Technical Specification Change

This letter is being written to request an official change in Section 5.1 of the Turkey Point Environmental Technical Specification. The proposed change involves only a change in existing wording, and not a change in the original intent of the words. Section 5.1, Review and Audit, paragraph 3, states in part:

"The licensee shall establish organizational and administrative procedures that will provide for both management review and independent audit functions for the following areas..."

Seven areas are then identified (a-g). "Independent audit functions" (which are performed by the Quality Assurance Department) are actually performed on only one of these areas, (a) Environmental Technical Specifications. The QA Department performs a comprehensive review of the ETS implementation in an annual audit.

To clarify which areas are actually being audited by the QA Department, we request that the above mentioned paragraph be changed to read as follows:

"The licensee shall establish organizational and administrative procedures that will provide for management review of the following areas..."

Also, the following paragraph should be added after 5.0.1.g (p. 19):

"The licensee shall also establish organizational and administrative procedures that will provide independent audit functions for the Environmental Technical Specifications. These audit functions shall be performed at least once per year."

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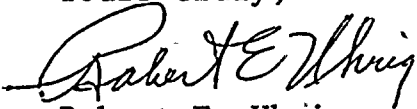
July 2, 1975

Although CERG compliance with areas b-g will be checked during the annual audit of ETS implementation, it was never the intention of FPL to perform an independent audit of each of the activities covered by areas b-g, each time the activity occurred. However, it is the intent of the Environmental Technical Specifications that a management review, such as that provided by the CERG, accompany each of these activities.

On this basis, this proposed change has no adverse impact on the safety and environmental requirements for PTP 3/4.

Attachment A sets forth the proposed change to the wording of the present Environmental Technical Specifications.

Yours truly,



Robert E. Uhrig
Vice President

REU:nch
Attachment

cc: Jack R. Newman, Esquire

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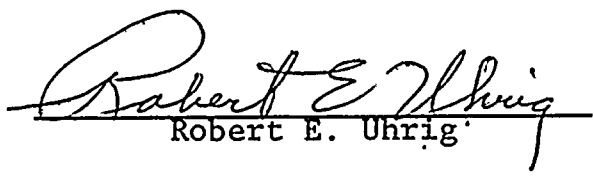
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STATE OF FLORIDA)
) SS
COUNTY OF DADE)

ROBERT E. UHRIG, being first duly sworn, deposes and says:

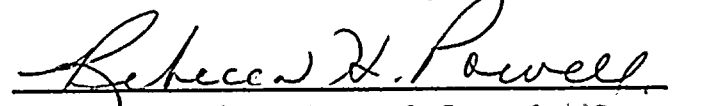
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the statements
made in this said 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.


Robert E. Uhrig

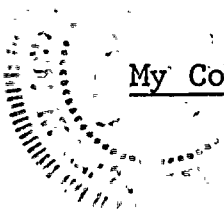
Subscribed and sworn to before me

this 2nd day of July, 1975


Notary Public, in and for the County
of Dade, State of Florida

NOTARY PUBLIC, STATE of FLORIDA at LARGE
MY COMMISSION EXPIRES APRIL 2, 1976

My Commission expires: ~~FORGED THRU MAXNARD BONDING AGENCY~~





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Regulatory Docket File

~~Received W/Ltr. Dated 7-2-75~~

5.0 ADMINISTRATIVE CONTROL

Objective: To describe the administrative controls and procedures necessary to implement the environmental technical specification.

Specification: 1. REVIEW AND AUDIT

The licensee shall be responsible for the establishment, execution and review of the necessary programs to administer the Environmental Technical Specifications (ETS). The licensee may delegate to other organizations the work of establishing and executing portions of the ETS, but shall retain responsibility therefor.

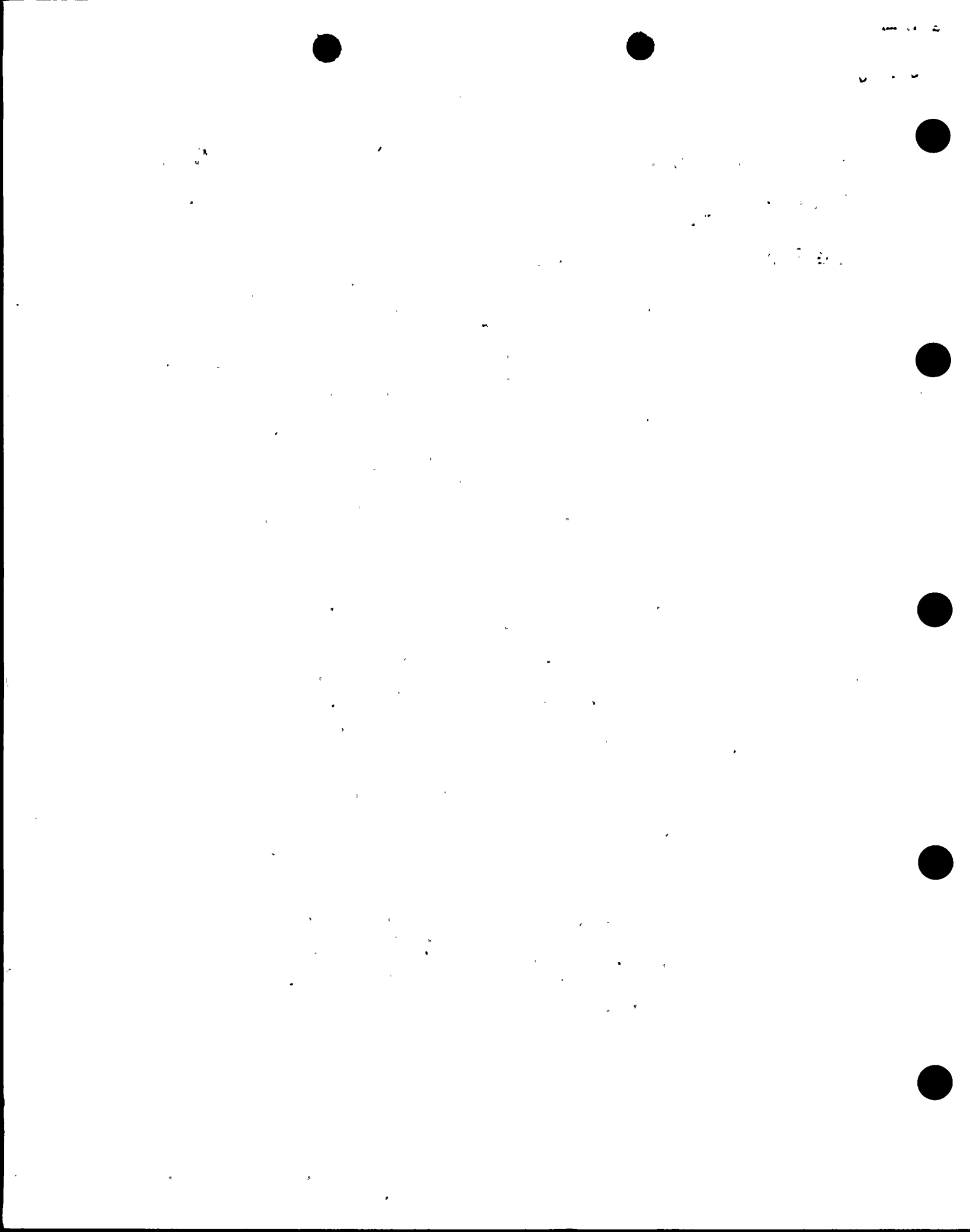
Administrative measures should provide that the individual or group assigned the responsibility for auditing or otherwise verifying that an activity has been correctly performed is independent of the individual or group directly responsible for performing the specific activity. The review function should not be performed by supervisory personnel involved in the activity under review.

The licensee shall establish organizational and administrative procedures that will provide for management review of the following areas:

| Change

- a. Environmental technical specifications
- b. Results of the environmental monitoring programs prior to their submittal in each semiannual Environmental Monitoring Report.
- c. Proposed changes to the environmental technical specifications and the evaluated impact of the change.
- d. Proposed changes or modifications to plant systems or equipment and the evaluated impact which would require a change in the procedures described in f. below, or which would affect the evaluation of the licensed facilities environmental impact.
- e. Coordination of environmental technical specification development with the safety technical specifications to avoid conflicts and for consistency.
- f. Proposed sampling, analysis, calibration and alarm

| Change 9



check procedures, as specified in 5.3.a. and any other proposed procedures or changes thereto as determined by the responsible company official to affect the licensed facilities environmental impact. | Change 9

- g. Investigation of all reported instances of violations of environmental technical specifications, including appropriate recommendations to prevent recurrence.

The licensee shall also establish organizational and administrative procedures that will provide independent audit functions for the Environmental Technical Specifications. The audit functions shall be performed at least once per year. | Change 9

2. ACTION TO BE TAKEN IF A PROTECTION LIMIT IS EXCEEDED

- a. Exceeding a protection limit should be promptly reviewed as specified in Section 5.1.
- b. As specified in Section 5.4.b., a separate report for each occurrence should be prepared. This report should include an evaluation of the cause of the occurrence, a record of the corrective action taken, and recommendations for appropriate action to prevent or reduce the probability of a recurrence.
- c. The circumstances of the occurrence should be reported to the AEC as specified in Section 5.4.b.

3. OPERATING PROCEDURES

- a. Detailed written procedures, including applicable check-off lists and instructions, should be prepared, approved as specified in Section 5.3.b and adhered to for operation of all systems and components involved in carrying out the environmental monitoring program. Procedures should include sampling, instrument calibration, analysis, and actions to be taken when limits are approached or exceeded.

Calibration frequencies for instruments used in performing the measurements required by the environmental technical specifications should be included.

Testing frequency of any alarms should be included. These frequencies should be determined from experience with similar instruments in similar environments and from manufacturers' technical manuals.

- b. All procedures described in 5.3.a above, and changes thereto, should be reviewed and approved, as specified in Section 5.1, prior to implementation. Temporary changes to procedures

