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FILE:

FROM: Florida Power & Light Company Miami, Fla. 33101 Mr. R.E. Uhrig			DATE OF DOC 11-23-73	DATE REC'D 11-27-73	LTR X	MEMO	RPT	OTHER
TO: R. C. Deyoung			ORIG 3 signed	CC	OTHER	SENT AEC PDR SENT LOCAL PDR		XXX XXX
CLASS XXX	UNCLASS	PROP INFO	INPUT XXX	NO CYS REC'D 22	DOCKET NO: <u>50-250/251</u>			

DESCRIPTION:
Ltr (notarized) 11-23-73...requesting a change to tech specs....trans the following.....

PLANT NAME: Turkey Point Units 3 & 4

ENCLOSURES:
REVISED PAGES to the tech specs.

(22 cys ea encl rec'd)

ACKNOWLEDGED

DO NOT REMOVE

FOR ACTION/INFORMATION

11-27-73

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Appr. 1/4

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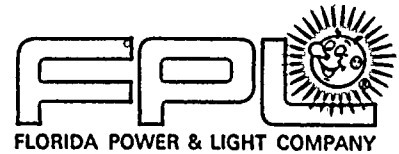
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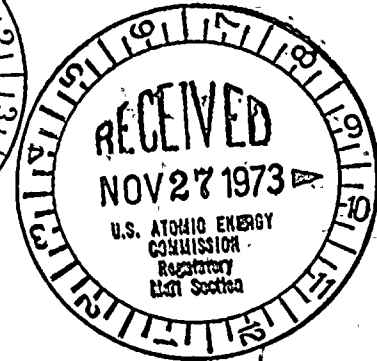
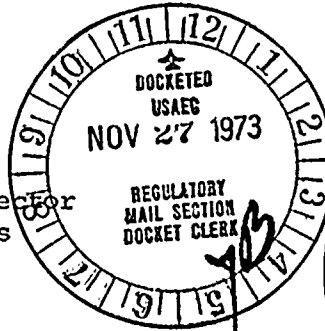
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Regulatory

File Cy.



November 23, 1973



Mr. R. C. DeYoung, Assistant Director
for Pressurized Water Reactors
Directorate of Licensing
Office of Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

Re: Turkey Point Plant Units 3 and 4
Docket Nos. 50-250 and 50-251

Dear Mr. DeYoung:

In accordance with 10 CFR 50.59, Florida Power & Light Company (FPL) submits herewith three signed originals and 19 additional copies of a request for authorization of a change in Technical Specifications attached as Appendix A to Facility Operating Licenses DPR-31 and 41.

The changes are as set forth in the attached revised Technical Specification pages and figures bearing this date in the lower right hand corner, and are as described below:

Page 4.7-2

In paragraph 3. of Specification 4.7.1 change "with" to "within" in the last sentence.

Pages 6.1-1 thru 6.1-7

Specifications 6.1.1 and 6.1.2 have been reworded. Titles have been changed in items 6.1.3-1.c, d., f., h., k., l., and m. and in items 6.1.3-2.e. and h. and 6.1.3-2.f. has been updated.

Page 6.1-8

Titles have been changed in 6.1.4-1.a.2.3.4 and 5. In 6.1.4-1.a.7. the word "Secretary:" has been deleted. The chairman will designate the secretary at meetings.

Page 6.1-10

Paragraph i. has been rewritten to permit the chairman to select the meeting secretary, and to permit the flexibility of using a non-member having shorthand skills.

8479

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Page 6.1-12

The title of the board chairman has been changed.

Page 6.1-13

The word "Secretary:" has been deleted from item d.7. to permit the chairman to designate a secretary from those present at meetings.

In the paragraph at the end of d., "non-voting" has been changed to "voting".

Page 6.1-15

The typographical error in i.6. has been corrected.

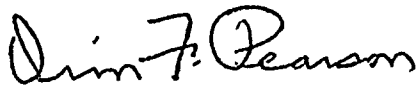
Figures 6.1-1 thru 6.1-3

These have been updated to show the current organization and titles.

Page B4.12-1

The bases have been updated to be consistent with the specification.

Very truly yours,

for 

Robert E. Uhrig
Director of Nuclear Affairs

REU:nch
Attach.

cc: Mr. Jack R. Newman, Esq.

APPROVED:



E. A. Adomat
Executive Vice President

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STATE OF FLORIDA)
) SS
COUNTY OF DADE)

E. A. ADOMAT, being first duly sworn, deposes and says:

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

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

Signed

E. A. Adomat

Subscribed and sworn to before me this 23rd day of

November, 1973.

Evelyn D. Kemp
Notary Public in and for the
County of Dade, State of Florida

My Commission expires:

July 13, 1977

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RECEIVED
MAY 10 1964
U.S. DEPARTMENT OF AGRICULTURE
WASHINGTON, D.C.

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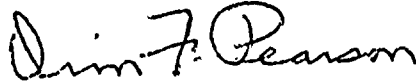
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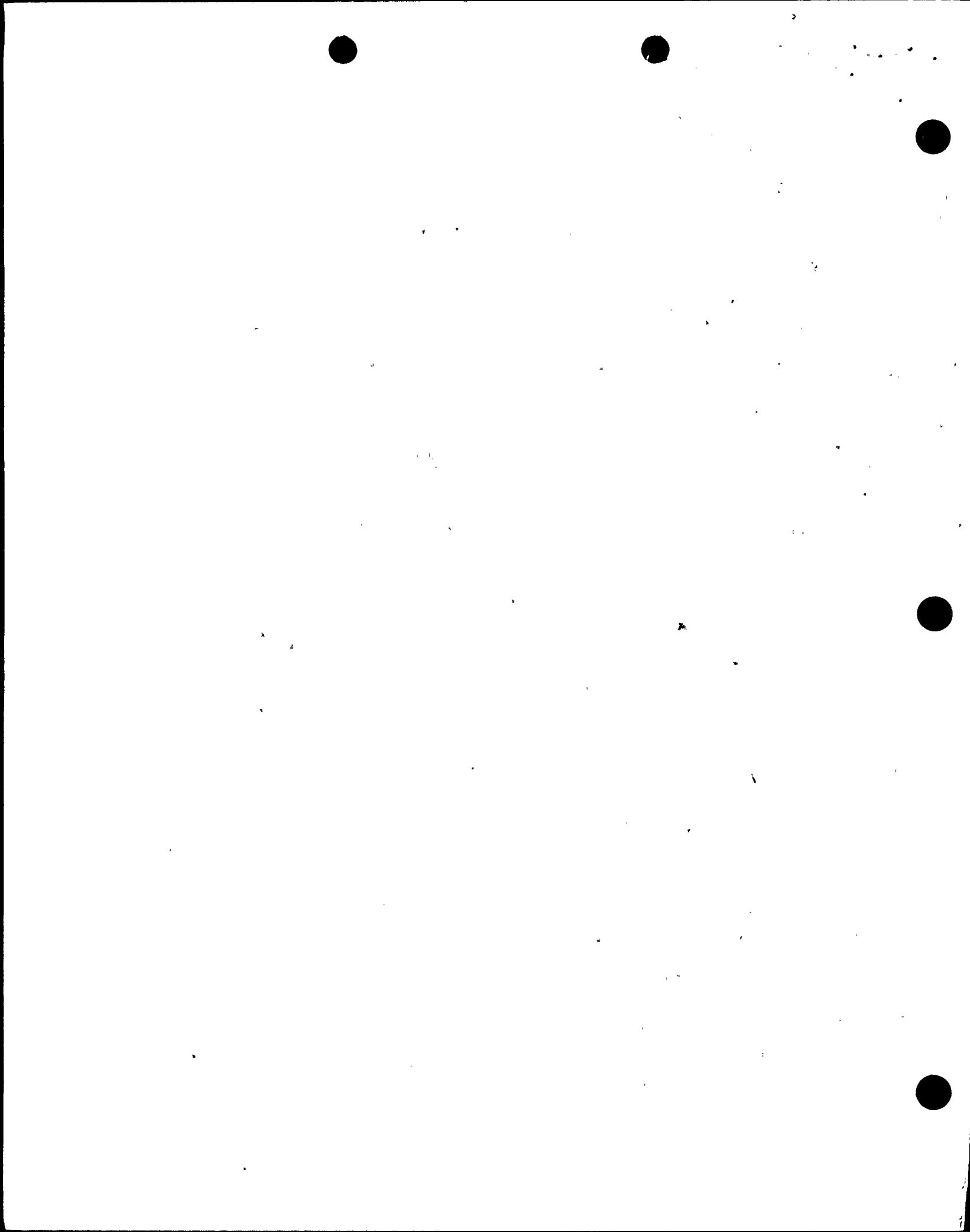
REU:nch
Attach.

cc: Mr. Jack R. Newman, Esq.

APPROVED:



E. A. Adomat
Executive Vice President



STATE OF FLORIDA)
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Subscribed and sworn to before me this 23rd day of

November, 1973.

Evelyn D. Kemp
Notary Public in and for the
County of Dade, State of Florida

My Commission expires:

January 13, 1977

3. LABORATORY TESTS

Quarterly, a charcoal surveillance specimen which had been located in a representative part of the containment will be withdrawn and laboratory tested for iodine removal capability. The charcoal shall demonstrate a removal efficiency of 99.9% for elemental iodine. Failing this, the charcoal within the containment filter system shall be replaced by charcoal which meets or exceeds original specifications.

4.7.2 POST-ACCIDENT CONTAINMENT VENT SYSTEM

1. OPERATING TESTS

A system test shall be performed during each scheduled refueling period, which shall consist of visual inspection and operation of all valves. Visual inspection shall include search for any foreign material, gasket deterioration in HEPA filters, and excessive dust cake on demister.

2. PERFORMANCE TESTS

During each refueling operation, "in-place" DOP and freon tests shall be conducted at design flow on the filters. 99.5% DOP and 99.0% freon removal shall constitute acceptable performance. The hydrogen concentration measuring instrument shall be calibrated with proper consideration to humidity during each refueling period.

11/23/73



6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, AND AUDIT

6.1.1 The Company management organization is shown in Figures 6.1-1 and 6.1-2. From time to time, the organization of the Company will change and the AEC will be notified of such changes in a timely manner.

6.1.2 The plant organization is shown in Figure 6.1.3. Major responsibilities within the organization are as follows:

- a. The Plant Manager is responsible for the safe operation of the nuclear and fossil facilities.
- b. The Nuclear Plant Superintendent is directly responsible for the safe operation of the nuclear facility and in all matters pertaining to operation of the nuclear units and to these Technical Specifications, the Nuclear Plant Superintendent shall report to and be directly responsible to the Plant Manager.

6.1.3 The qualifications of the plant staff members and the functions of the plant organization are as follows:

1. Minimum qualifications with regard to educational background and experience of classifications shown in Figure 6.1-3 are as follows:

a. Plant Manager

The Plant Manager shall have ten years of responsible power plant experience of which a minimum of three years shall be nuclear power plant experience. A maximum of four years of the remaining seven years of experience may be fulfilled by academic training on a one-for-one time basis. This academic training shall be in an engineering or scientific field generally associated with power production. The Plant Manager shall have acquired the experience and training normally required for examination by the AEC for a Senior Reactor Operator's License whether or not the examination is taken. Where the Nuclear Plant Superintendent meets the Senior Operator License requirements the Plant



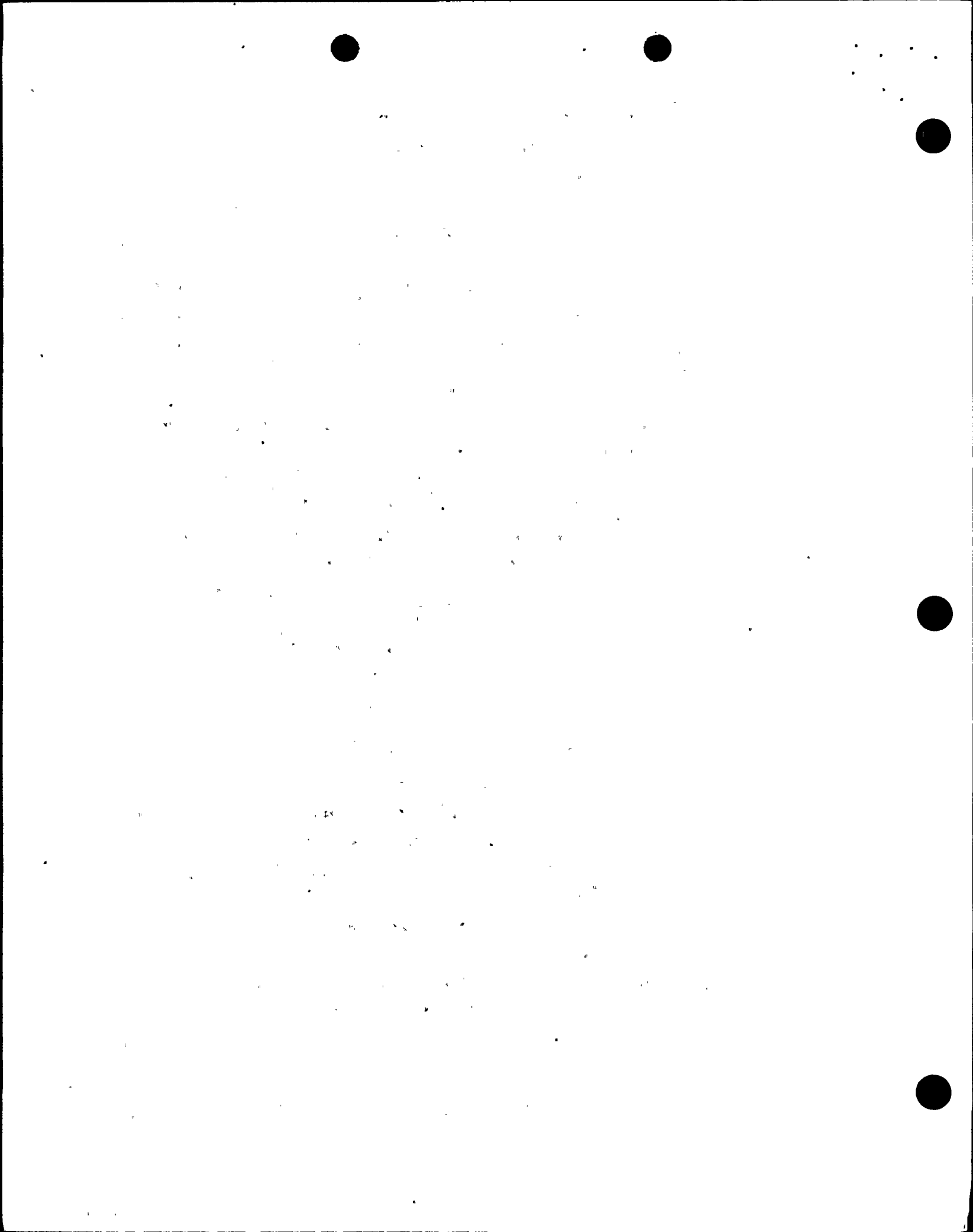
Manager need only have one of his ten years be nuclear plant experience and need not be eligible for AEC examination.

b. Nuclear Plant Superintendent

The Nuclear Plant Superintendent shall have ten years of responsible power plant experience of which a minimum of three years shall be nuclear power plant experience. A maximum of four years of the remaining, seven years of experience may be fulfilled by academic training on a one-for-one time basis. This academic training shall be in an engineering or scientific field generally associated with power production. The Nuclear Plant Superintendent shall have acquired the experience and training normally required for examination by the AEC for a Senior Reactor Operator's License whether or not the examination is taken. Where the Plant Manager meets the Senior Operator License requirement the Nuclear Plant Superintendent need only have one of his ten years be nuclear plant experience and need not be eligible for AEC examination.

c. Nuclear Operations Superintendent

The Nuclear Operations Superintendent shall have a minimum of eight years of responsible power plant experience of which a minimum of three years shall be nuclear power plant experience. A maximum of two years of the remaining five years of power plant experience may be fulfilled by satisfactory completion of academic or related technical training on a one-for-one time basis. He shall hold a Senior Reactor Operator's License.



d. Assistant Superintendent - Technical

The Assistant Superintendent - Technical should have a minimum of eight years in responsible positions, of which one year shall be nuclear power plant experience. A maximum of four years of the remaining seven years of experience should be fulfilled by satisfactory completion of academic training.

e. Maintenance Superintendent

The Maintenance Superintendent shall have a minimum of seven years of responsible power plant experience or applicable industrial experience, a minimum of one year of which shall be nuclear power plant experience. A maximum of two years of the remaining six years of power plant or industrial experience may be fulfilled by satisfactory completion of academic or related technical training on a one-for-one time basis. He should have non-destructive testing familiarity, craft knowledge and an understanding of electrical, pressure vessel and piping codes.

f. Assistant Superintendent - Nuclear Maintenance

The Assistant Superintendent - Nuclear Maintenance shall have a minimum of seven years of responsible power plant experience or applicable industrial experience, a minimum of one year of which shall be nuclear power plant experience. A maximum of two years of the remaining six years of power plant or industrial experience may be fulfilled by satisfactory completion of academic or related technical training on a one-for-one time basis. He should have non-destructive testing familiarity, craft knowledge and an understanding of pressure vessel and piping codes.



g. Radiochemist

The Radiochemist shall have a minimum of five years experience in chemistry of which a minimum of one year shall be in radiochemistry. A minimum of two years of this five years experience should be related technical training. A maximum of four years of the five years experience may be fulfilled by related technical or academic training.

h. Assistant Superintendent - Instrument and Control

The Assistant Superintendent - Instrument and Control shall have a minimum of five years experience in instrumentation and control, of which a minimum of six months shall be in nuclear instrumentation and control. A minimum of two years of this five years experience should be related technical training. A maximum of four years of this five years experience may be fulfilled by related technical or academic training.

i. Reactor Engineer

The Reactor Engineer shall have a minimum of a Bachelor Degree in Engineering or the Physical Sciences and two years experience in such areas as reactor physics, core measurements, core heat transfer, and core physics testing programs.

j. Health Physicist

The Health Physicist shall have a minimum of five years experience in radiation protection at a nuclear reactor facility. A minimum of two years of this five years experience should be related technical training. A maximum of four years of this five years experience may be fulfilled by related technical or academic training.



k. Nuclear Plant Supervisors

The Nuclear Plant Supervisors shall have a minimum of a high school diploma or equivalent and four years of responsible power plant experience of which a minimum of one year shall be nuclear power plant experience. A maximum of two years of the remaining three years of power plant experience may be fulfilled by academic or related technical training on a one-for-one time basis. He shall hold an AEC Senior Operator License.

l. Nuclear Watch Engineers

The Nuclear Watch Engineers shall have a high school diploma or equivalent and four years of power plant experience of which a minimum of one year shall be nuclear power plant experience. He shall hold an AEC Senior Operator License. During initial start-up of the first unit, he may hold an AEC Operator License in lieu of a Senior Operator License.

m. Nuclear Control Center Operators

The Nuclear Control Center Operators shall have a high school diploma or equivalent and two years of power plant experience of which a minimum of one year shall be nuclear power plant experience. He shall hold an AEC Reactor Operator License.

n. Unlicensed Operators

The unlicensed operators shall have a high school diploma or equivalent and should possess a high degree of manual dexterity and mature judgment.

o. Technicians

Technicians in responsible positions shall have a minimum of two years of working experience in their specialty and should have a minimum of one year of related technical training in addition to their experience.



Maintenance Personnel

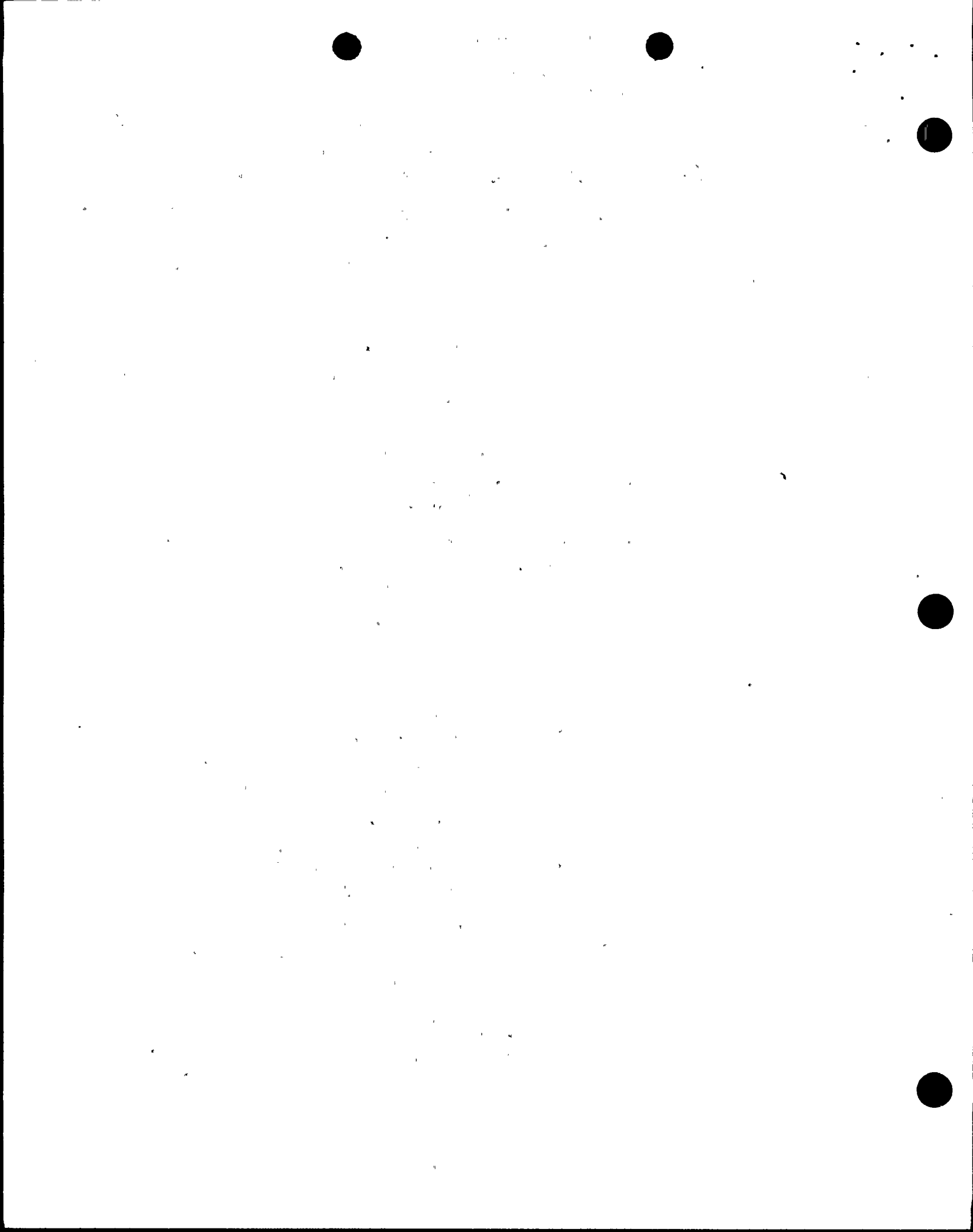
Maintenance personnel in responsible positions shall have a minimum of three years experience in one or more crafts. They should possess a high degree of manual dexterity and ability and should be capable of learning and applying basic skills in maintenance operations.

2. The operating organization shall be comprised and shall function as follows:

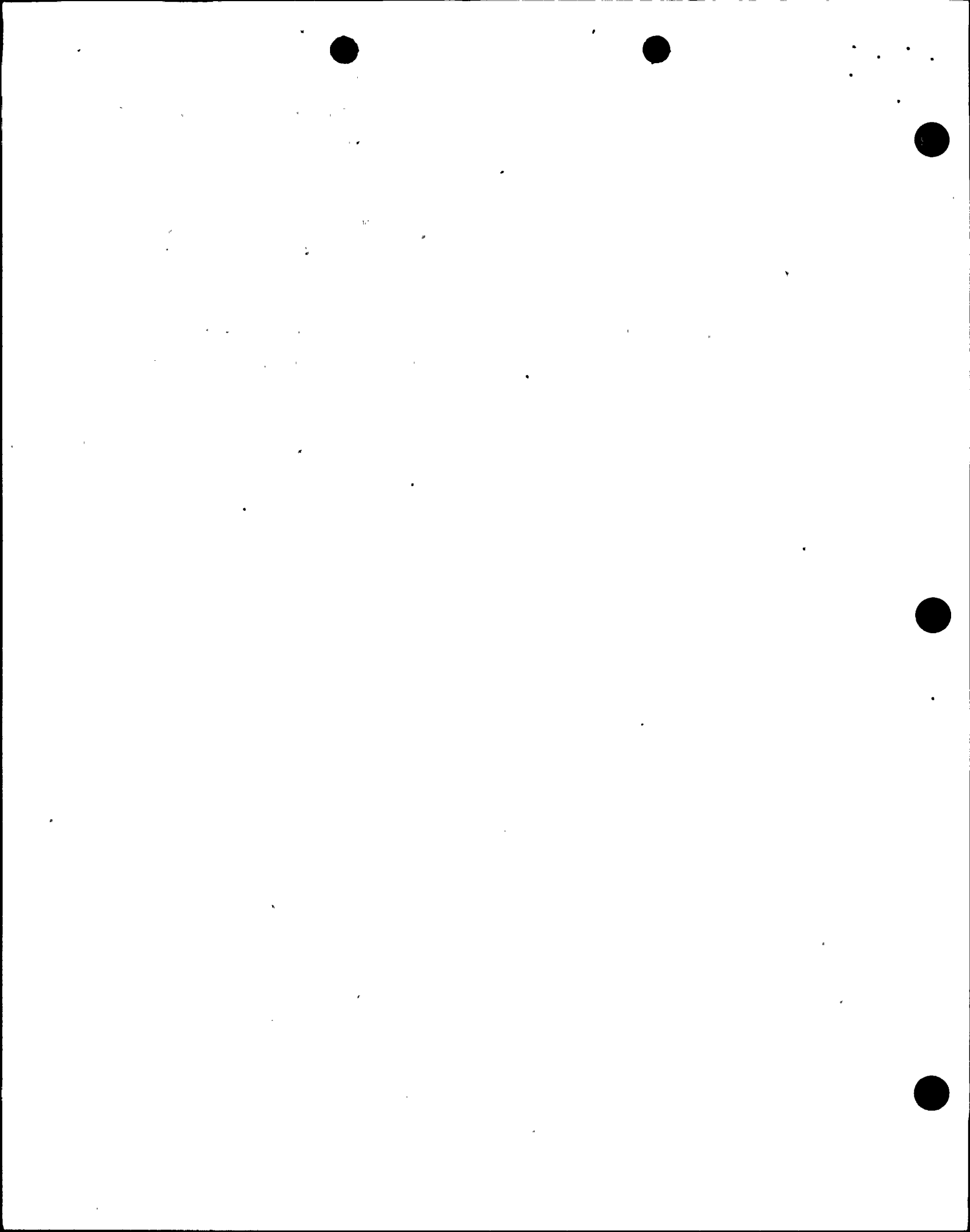
- a. The number of licensed and unlicensed operating personnel assigned to each operating shift is shown in Table 6.1-1.
- b. One licensed operator shall be in the control room at all times when there is fuel in either reactor.
- c. A licensed Senior Operator shall be on site at all times when there is fuel in either reactor.
- d. Two licensed operators shall be in the control room during start-up and shutdown of either unit and during recovery from trips caused by transients or emergencies.
- e. When there is fuel in both reactors, the Nuclear Plant Supervisor shall take direct charge of the affected unit during the following operations:
 1. Startup and approach to power.
 2. Recovery from an unplanned or unscheduled shutdown or significant reduction in power.
 3. Refueling (except 1 and 2 above take precedence).

A licensed Senior Operator shall be in direct charge of the second unit during the above operations and co-ordinate his activities with the Nuclear Plant Supervisor as necessary.

- f. All licensed shift operating personnel will be required to hold applicable AEC license on both Units 3 and 4.



- g. A licensed operator will be responsible for implementing radiation protection procedures on each shift.
 - h. Shift operating personnel assigned to Units No. 3 & 4 other than the Nuclear Plant Supervisors will not perform regularly assigned duties related to Units No. 1 & 2 operation.
3. A training program which meets the provisions of ANSI 18.1 dated March 8, 1971, shall be established.



6.1.4

Organizational units for the review and audit of plant operations shall be constituted and have the responsibilities and authorities outlined below:

1. Plant Nuclear Safety Committee

a. Membership

1. Chairman: Nuclear Plant Superintendent
2. Vice Chairman: Nuclear Operations Superintendent
3. Assistant Superintendent - Technical
4. Assistant Superintendent - Nuclear Maintenance
5. Assistant Superintendent - Instrument and Control
6. Health Physicist
7. Reactor Engineer
8. Radiochemist

b. Qualifications:

The qualifications of the regular members of the Plant Nuclear Safety Committee with regard to the combined experience and technical specialties of the individual members shall be maintained at a level equal to those described in 6.1.3.

c. Consultants:

Additional personnel with expertise in specific areas such as radiochemistry, reactor engineering, and health physics may serve as consultants to the Plant Nuclear Safety Committee.

d. Meeting frequency: Monthly, and as required, on call of the Chairman.

to be more conservative will be followed. Records of the disagreement will be included in the minutes sent for review to the Manager of Power Resources - Nuclear and the Company Nuclear Review Board.

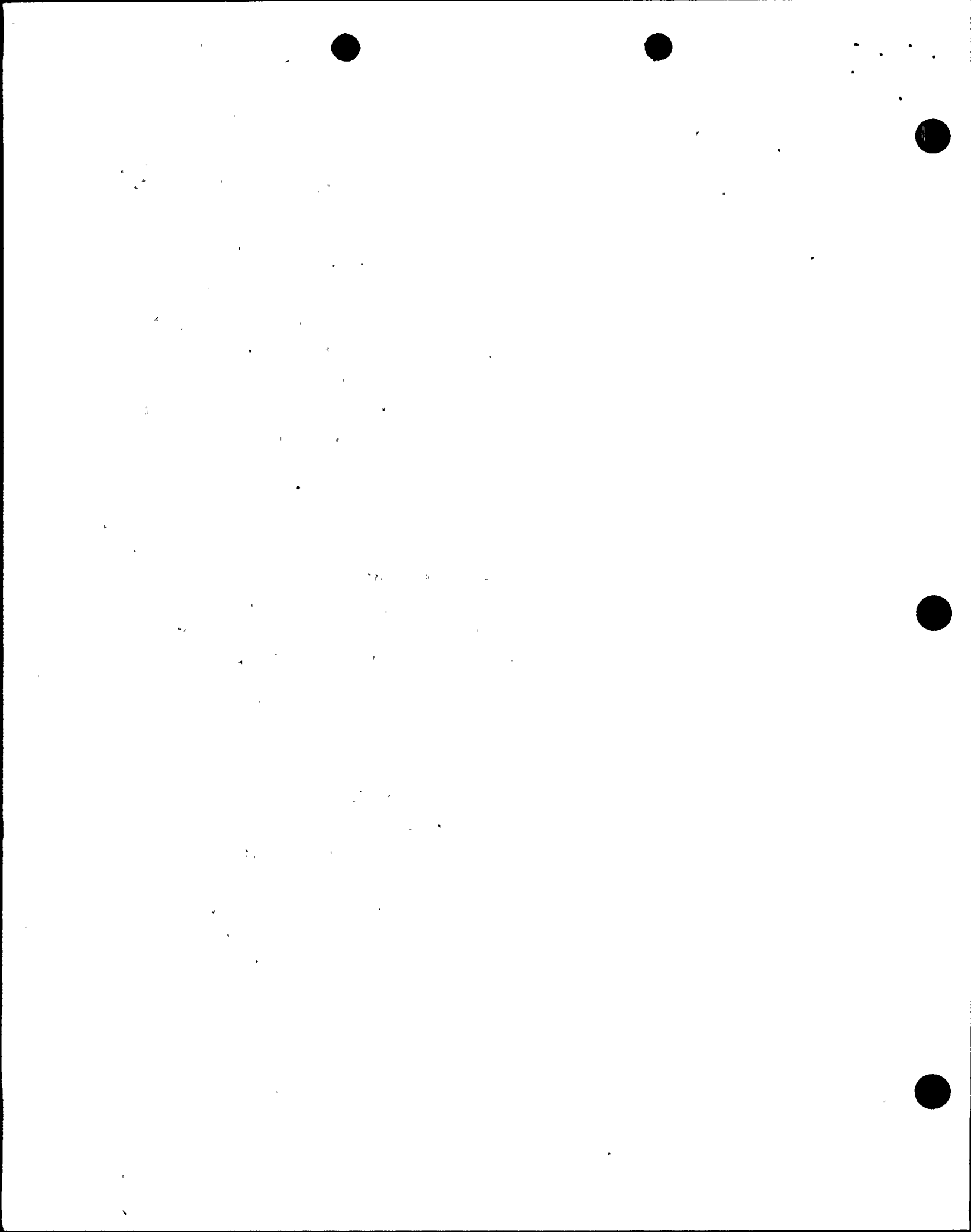
3. The Plant Nuclear Safety Committee shall make tentative determinations as to whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review and approval by the Company Nuclear Review Board.

- i. Records:

Minutes of meetings shall be made by an individual designated by the chairman and shall be kept at the plant. Copies shall be sent to the Manager of Power Resources - Nuclear and to the Company Nuclear Review Board.

- j. Procedures:

Written administrative procedures for committee function shall be prepared and maintained describing the method of submission, and the content of presentations to the committee; provisions for the use of subcommittees; review and approval by members of written committee evaluations and recommendations; the distribution of minutes; and, such other matters as may be appropriate.



The operation of the nuclear units shall be formally audited on a periodic basis. These audits shall be performed no less frequently than semi-annually. Periodic review of the audit activity shall be performed by the board to assure that such audits are being accomplished in accordance with requirements of Technical Specifications. Such audits shall include verification of conformance with normal, off normal, maintenance and emergency surveillance, test and radiation control procedures and the Emergency and Security Plans. These audits shall be performed in accordance with appropriate written instructions or procedures and shall include verification of compliance with internal rules, procedures and regulations and license provisions, performance of the operating staff; and corrective actions following anomalies. Written reports of such audits shall be incorporated in the records of the board and disseminated to appropriate members of management, including those having responsibility in the area audited. Follow-up action, including re-audit of deficient areas, shall be taken when indicated and results reported to responsible management levels.

d. Membership:

1. Chairman: Director of Nuclear Affairs
2. Vice Chairman: Chief Engineer- Power Plants
3. Member: Director of Power Resources
4. Member: Project Manager
5. Member: Manager of Power Resources - Nuclear



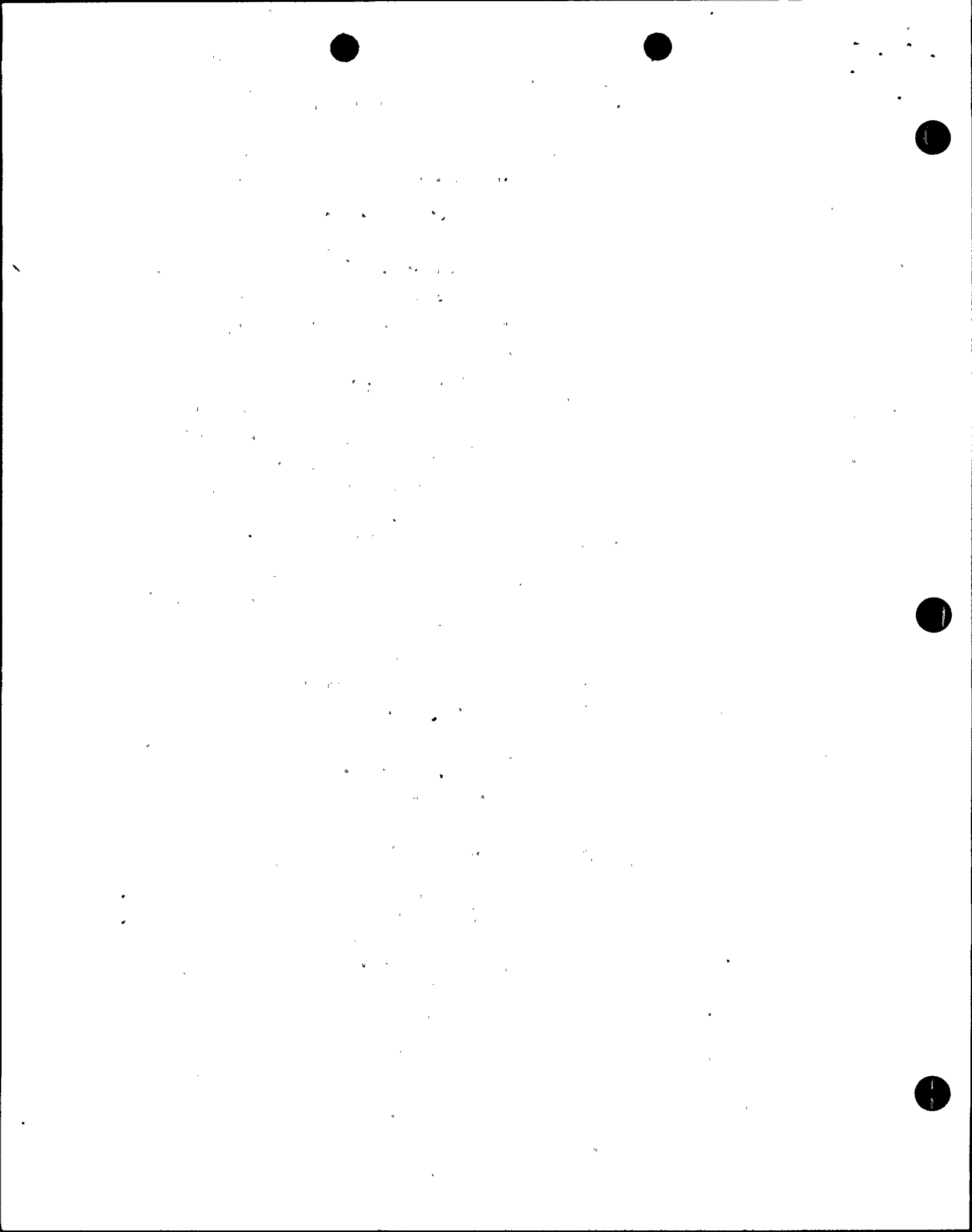
6. Member: Manager of Quality Assurance
7. Member: Project Engineer
8. Non Voting Member: Nuclear Plant Superintendent
9. Non Voting Members: Staff Specialists and Consultants

Qualified alternates shall be appointed or other provisions shall be made for covering the absence of full time members of the group. To accomplish this, each voting member shall designate a permanent alternate to serve in his absence, and a current list of these voting alternates shall be maintained in board records. The use of alternates shall be restricted to legitimate and unavoidable absences of principals and shall be limited to not more than two alternates.

e. Qualifications:

1. At least four voting members including alternates shall have a minimum of a Bachelor's Degree in Engineering or the Physical Sciences and have a minimum of three years of professional level experience in nuclear engineering, and the necessary overall nuclear background to determine when to call consultants and contractors for dealing with complex problems beyond the scope of the Company organization.
2. Members shall collectively have the capability required to review the areas of:

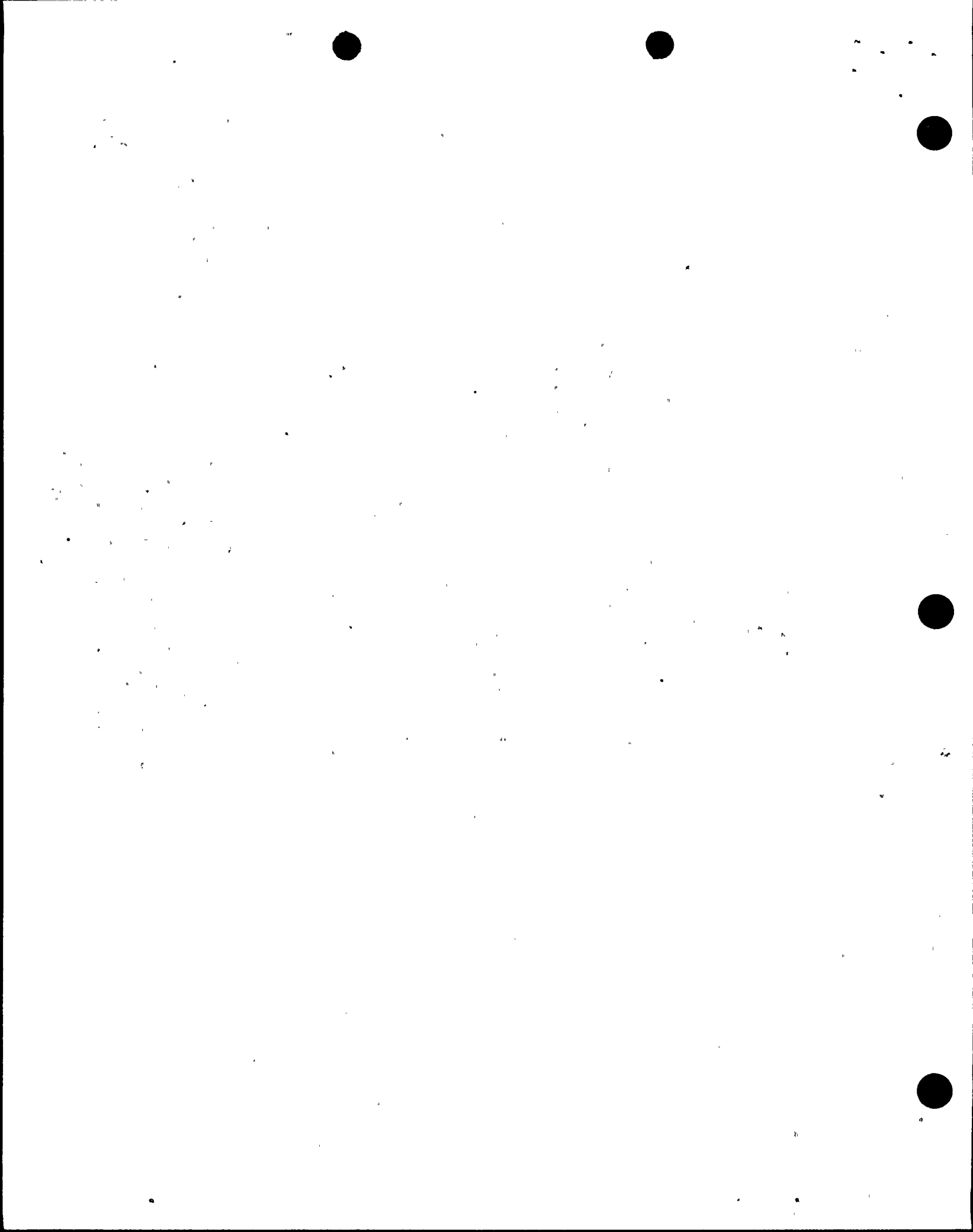
- reactor operations
- nuclear engineering
- chemistry and radiochemistry
- metallurgy
- instrumentation and control
- radiological safety
- mechanical and electrical engineering

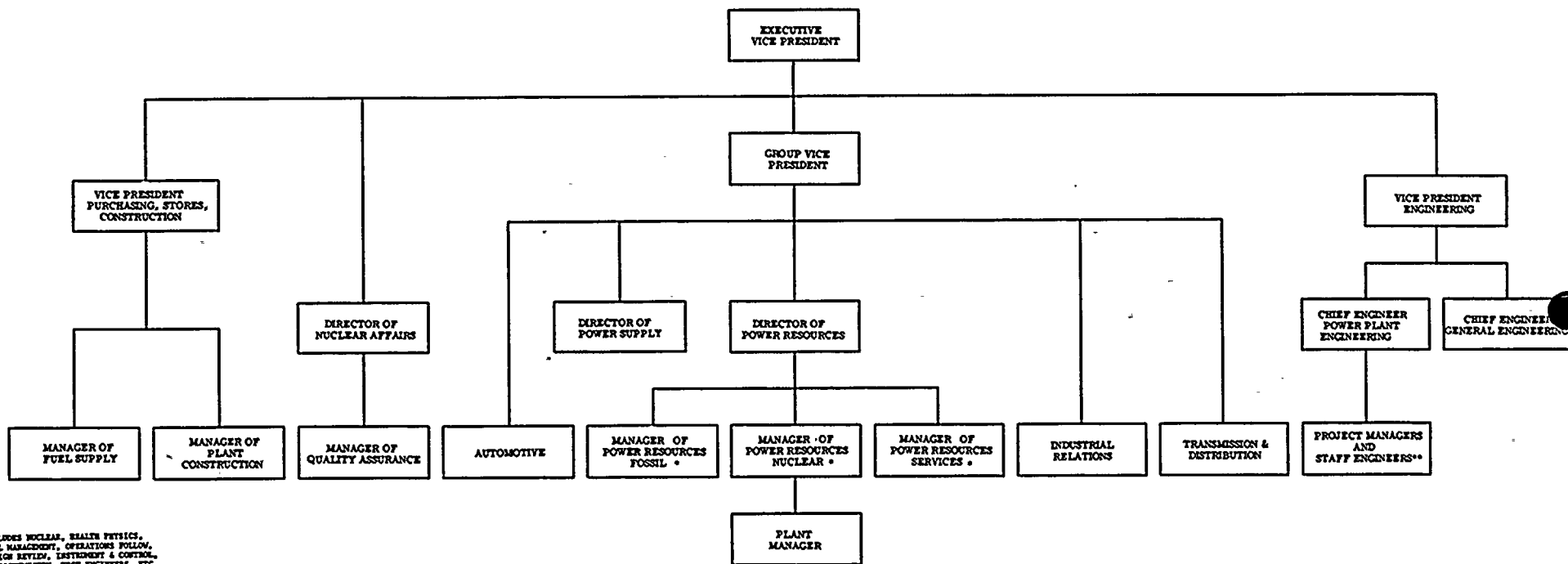


i. Subjects reviewed:

1. Proposed tests and experiments, and results thereof, when these constitute an unreviewed safety question defined in 10CFR50.59.
2. Proposed changes in equipment or systems which may constitute an unreviewed safety question defined in 10CFR 50.59, or which are referred by the operating organization.
3. Proposed changes to the licenses or Technical Specifications in Appendix A of the licenses.
4. Violations of statutes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions having safety significance.
5. Significant operating abnormalities or deviations from normal performance of unit equipment.
6. Abnormal occurrences as defined in 1.13.
7. The Emergency Plans and procedures.
8. The Plant Security Plan and procedures.
9. Environmental radiological monitoring.
10. Nuclear safety matters deemed essential to the safe operation of the facility by the Nuclear Plant Superintendent, the Plant Nuclear Safety Committee, the Manager of Power Resources - Nuclear and the Director of Power Resources.
11. Reports and meeting minutes of the Plant Nuclear Safety Committee.
12. Reports to the AEC and AEC responses.





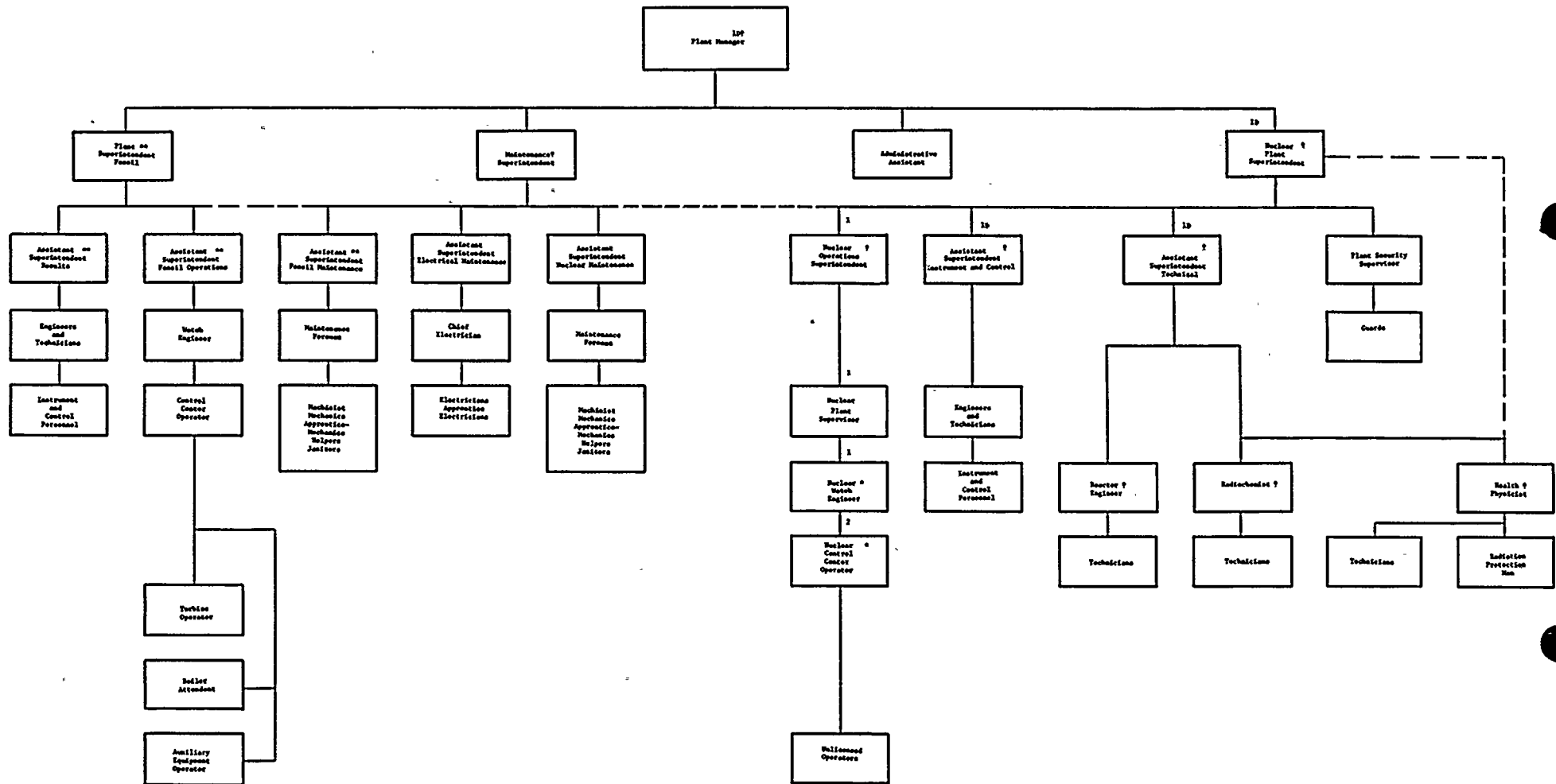


* INCLUDES NUCLEAR, HEAVY PHYSICS, FUEL MANAGEMENT, OPERATIONS FOLLOW, DESIGN REVIEW, INSTRUMENT & CONTROL, RADIOINDUSTRY, TEST ENGINEERS, ETC.

** INCLUDES NUCLEAR MECHANICAL, ELECTRICAL, & CIVIL GROUPS

SEE FIGURE 6.1-3





1 = Senior Operator License

2 = Operator License

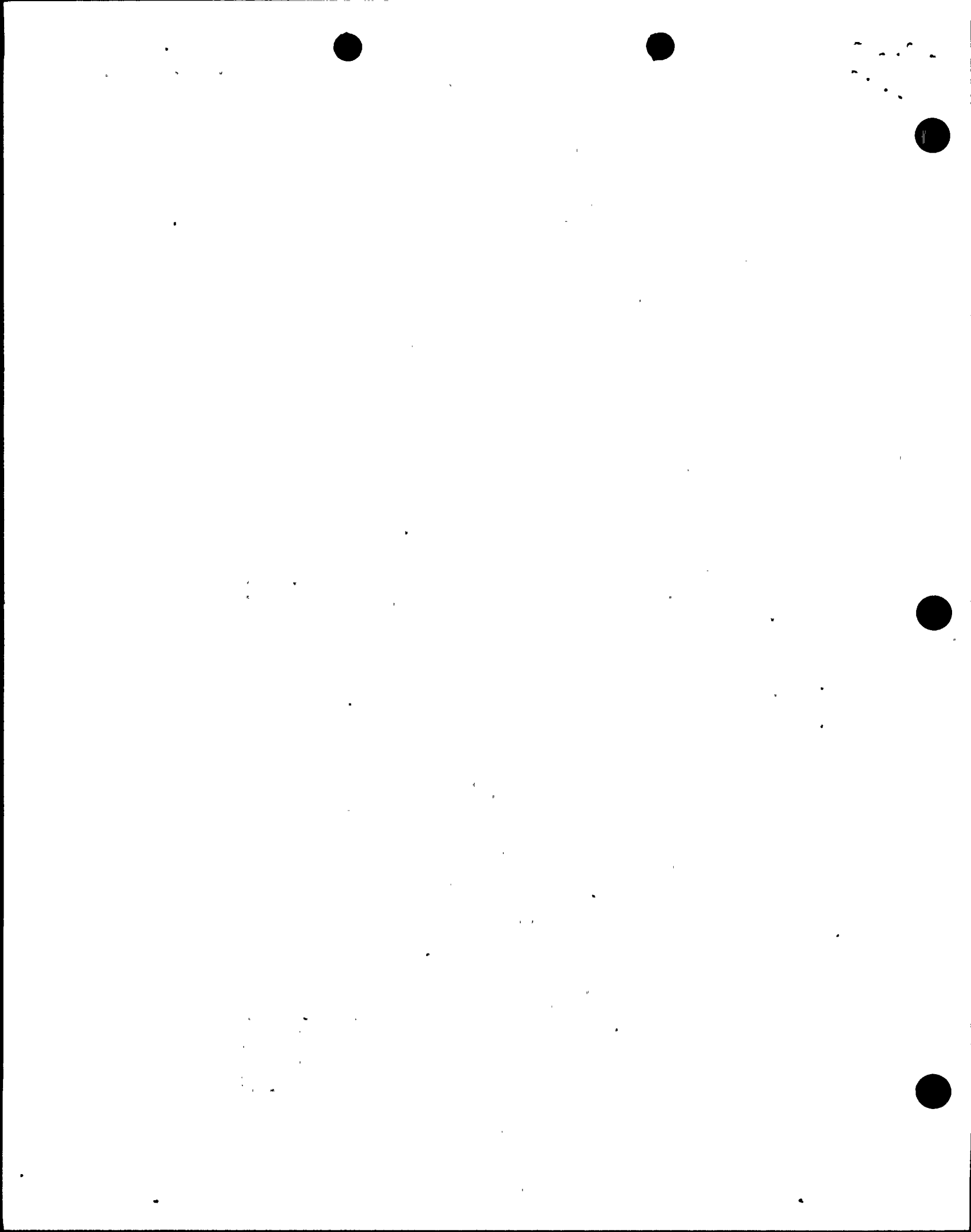
3 = Desirable but Not Required

4 = Key Supervisory Personnel

5 = Licensed personnel on shift

6 = as shown in Table 4-3-1

7 = Not Part of these Technical Specifications



The radiological environmental monitoring program is designed to determine existing radioactivity levels and to detect changes in radiation levels in the air, water or land environment which may be attributed to the operation of the nuclear units. The methods, procedures and techniques developed during the preoperational phase have been utilized to provide background measurements as a basis for distinguished significant changes in radioactivity in the site environs. (1)

The radiological environmental monitoring program sample collection frequency and analysis or counting performed on samples of air, water, sediment, aquatic biota, and terrestrial materials is given in Table 4.12-1. This schedule is designed to ensure that changes in the environmental radioactivity can be detected.

Reference:

- (1) FSAR - Section 2.12

