

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

TO: Mr. George Lear		FROM: Florida Power & Light Company Miami, Florida Robert E. Uhrig		DATE OF DOCUMENT 5/9/77	
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DESCRIPTION

Ltr. furnishing information regarding the qualifications of the individual performing the function of Health Physics Supervisor.....

ACKNOWLEDGED

(2-P)

PLANT NAME:
Turkey Point Units 3 & 4

RJL

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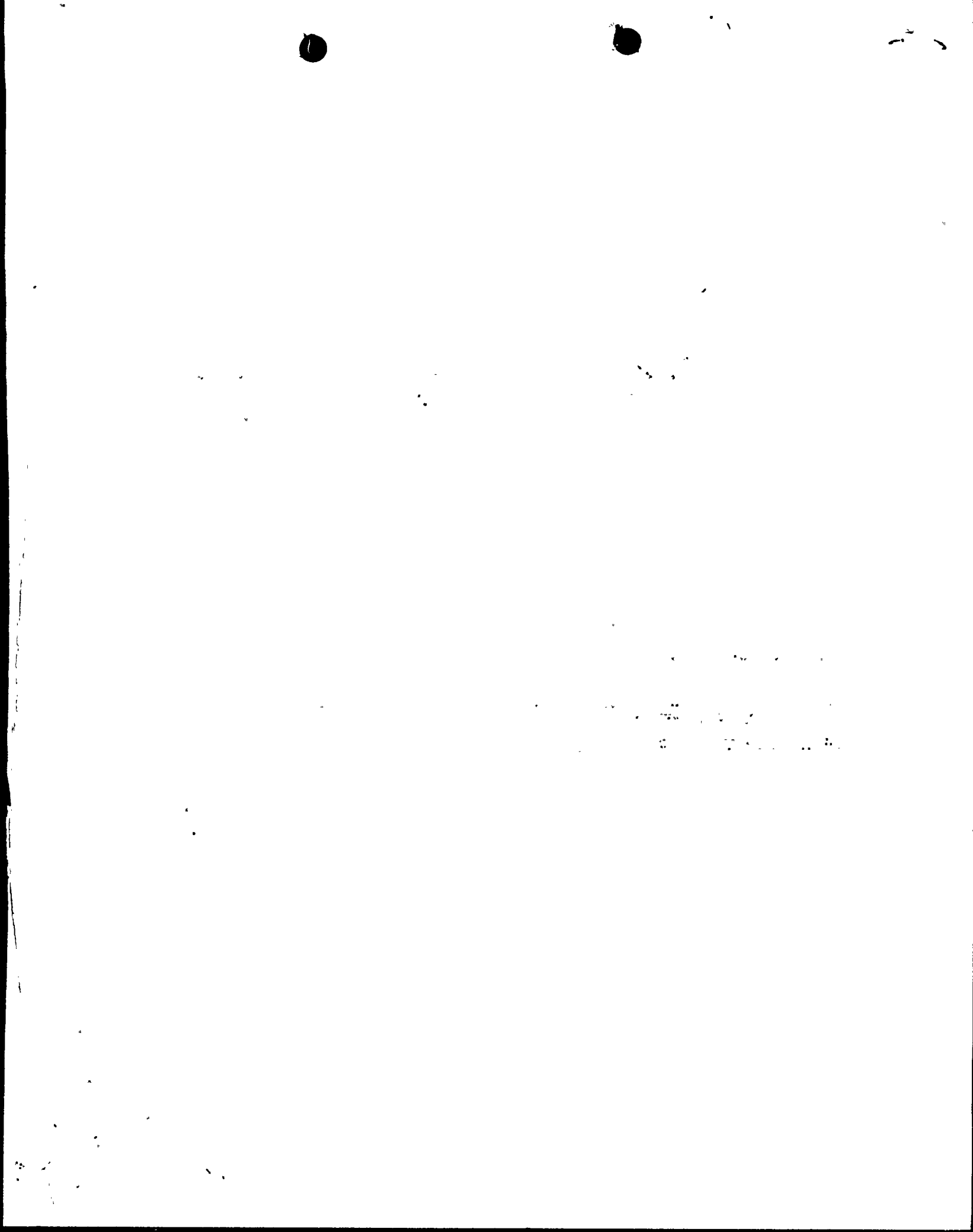
ENCLOSURE

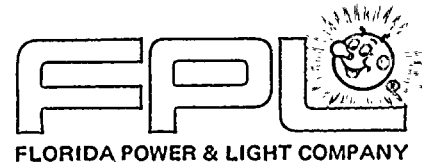
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ASLB:	CONSULTANTS:		
ACRS 16 CYS HOLDING SENT 15 OCT 13			





May 9, 1977
L-77-142

Office of Nuclear Reactor Regulation
Attention: Mr. George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington DC 20555

REGULATORY DOCKET FILE COPY



Dear Mr. Lear:

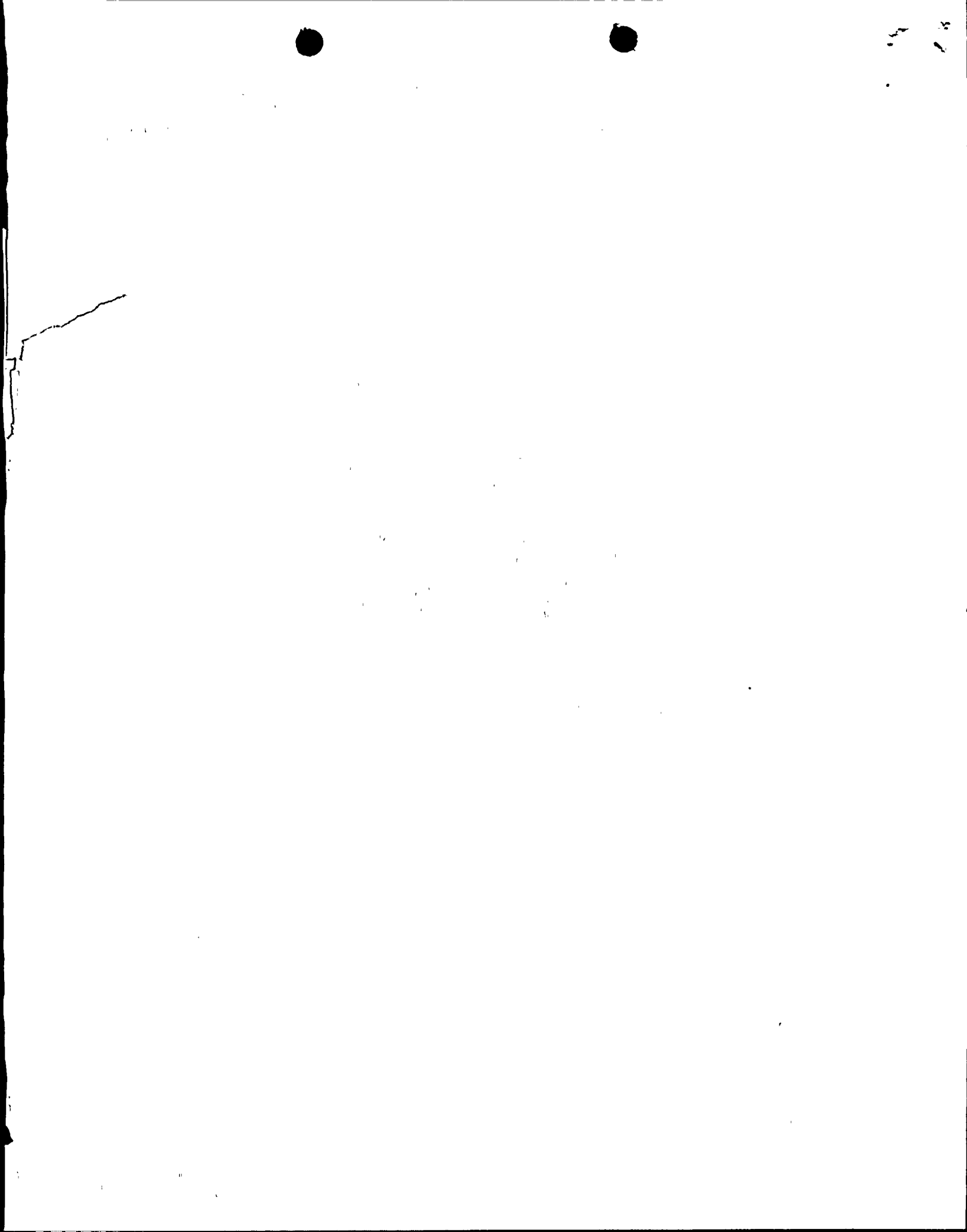
Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
HP Supervisor Requirements

Your letter of March 2, 1977, requested that we determine if the individual performing the function of Health Physics Supervisor (HPS) at Turkey Point meets the minimum qualifications of Regulatory Guide 1.8, September 1975, and, if so, that we propose a corresponding change to the Administrative Controls section of the Technical Specifications. We have completed our review and have determined that the Turkey Point HPS meets the minimum qualifications of the Guide. We are also preparing a proposed Technical Specification amendment that will meet the intent of Regulatory Guide 1.8, September 1975, and plan to submit it by June 15, 1977.

In addition, your letter listed six criteria regarding the activities "individuals qualified in radiation protection procedures" should be able to perform, and stated that the OI&E Inspector assigned to our facility will be using these criteria in determining whether our designated individuals meet the requirements.

Specifying the meaning of "individual qualified in radiation protection procedures" found in section 6.2.2.d of the Turkey Point facility Technical Specifications, constitutes a modification of the Turkey Point Technical Specifications. Florida Power & Light Company feels that this change should be initiated in a similar manner as other changes to our Technical Specifications. In particular, we do not feel that it is appropriate for the NRC staff to change the meaning of a Technical Specification without first giving the facility an opportunity to comment on the change. It would serve our mutual interest if we were allowed to participate in the

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development of new requirements. Therefore, we are reviewing the criteria and plan to give you our written comments by July 1, 1977. We request that OI&E audits in this area be deferred until the proposed change has been properly submitted to the staff and approved.

Very truly yours,



Robert E. Uhrig
Vice President

REU/MAS/HFS/tm
Attachment

cc: Norman C. Moseley, Region II
Robert Lowenstein, Esquire

