

January 8, 2001

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: REVIEW OF REQUESTS FOR EXEMPTION - BRAIDWOOD, BYRON, AND
QUAD CITIES STATIONS (TAC NOS. MB0290, MB0291, MB0288, MB0289,
MB0284, MB0285)

Dear Mr. Kingsley,

By letter dated October 17, 2000, as supplemented by letter dated November 22, 2000, Commonwealth Edison (ComEd) requested an exemption for individuals in the current operator licensing classes at Braidwood, Byron, and Quad Cities from the requirements of 10 CFR 55.31(a)(5). Section 55.31(a)(5), "How to Apply," states, the applicant shall: "Provide evidence that the applicant, as a trainee, has successfully manipulated the controls of the facility for which a license is sought. At a minimum, five significant control manipulations must be performed which affect reactivity or power level." By letter dated October 17, 2000, and supplement dated November 22, 2000, the licensee, acting as an agent for the individuals currently enrolled in an operator training class, requested an exemption from the requirements of 10 CFR 55.31 (a)(5), that require the five significant control manipulations be performed on the facility by the individual applicants. The proposed exemption would allow certain individual operator licensing applicants to perform the five significant control manipulations on the plant-referenced simulator facility in lieu of using the actual plant.

Eligibility for an operator license encompasses education, training, and experience factors. Reactivity manipulations are an operating experience requirement addressed by on-the-job training. Use of a plant-referenced simulator of appropriate fidelity for such manipulations is appropriate, based upon improvements in simulator technology, and thirteen years of successful experience in using plant-specific simulation facilities since the 1987 revision of 10 CFR 55. Modern plant-referenced simulation facilities in operation today are providing accurate and validated plant training and examination scenarios that convey realism in reactivity manipulations and complex plant operations including simultaneous task management and faulted conditions. The proposed exemption would allow part of the plant operating experience requirements for individual operator license eligibility to be fully satisfied in a timely manner within the licensee's Commission-approved training program without impacting operation of the actual plant.

The Braidwood, Byron, and Quad Cities operator training programs are Commission-approved training programs that are based on a systems approach to training and use simulation facilities acceptable to the Commission. Commonwealth Edison has pre-tested reactivity control manipulation simulator scenarios and adequate simulator fidelity support programs that provide

software control. In addition, Commonwealth Edison will be using the same controlled procedures that are used in the actual control room for the required significant control manipulations.

Pursuant to 10 CFR 55.11, "Specific exemptions," the Commission may, upon application by an interested person, or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest.

The Commission has determined that the proposed alternative method using the plant-referenced simulator facility in lieu of the actual plant, as described above, will meet the intent of performing significant control manipulations. Accordingly, the Commission has determined that the proposed exemption: (1) is authorized by law; (2) will not endanger life or property; (3) will not endanger the common defense and security; and (4) is otherwise in the public interest. Therefore, exemptions will be granted to the operator licensing applicants listed in the November 22, 2000, letter at the time that the individual operator or senior operator licenses are issued.

Approval upon this basis is consistent with guidelines set forth in SECY 99-225, "Rulemaking Plan for Changes to 10 CFR Part 55 to Reduce Unnecessary Regulatory Burden Associated with the Use of Simulation Facilities in Operator Licensing," for interim regulatory relief in this area.

Sincerely,

/RA/

Bruce A. Boger, Director
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-456, 50-457
50-454, 50-455
50-254, 50-265

cc: See next page

O. Kingsley

- 2 -

Mr. O. Kingsley

-2-

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/RA/

Bruce A. Boger, Director
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Office of Nuclear Reactor Regulation

Docket Nos. 50-456, 50-457
50-454, 50-455
50-254, 50-265

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