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RS-01-140

July 9, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Three Mile Island Nuclear Station, Unit 1
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Subject: Request for Amendment to Operating License Conditions and Technical Specifications Administrative Controls to Incorporate Revision to 10 CFR 50.59, "Changes, tests, and experiments"

Reference: Technical Specifications Task Force (TSTF) Traveler-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Revision 0, as amended by WOG ED-24.

A001

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, and AmerGen Energy Company, LLC (i.e., AmerGen) proposes changes to Appendix A, Technical Specifications (TS), of the Facility Operating Licenses listed above. The proposed changes are to the TS "Administrative Controls" Sections and will provide consistency with the changes to 10 CFR 50.59, "Changes, tests, and experiments," as published in the Federal Register (FR) Volume 64, beginning on page 53582 (i.e., 64 FR 53582), dated October 4, 1999. In addition EGC is proposing a similar change to a License Condition 3.B for the Peach Bottom Atomic Power Station.

These proposed changes to the TS Administrative Controls Section for those facilities that have converted to the Improved Standard Technical Specifications (ISTS) are consistent with TSTF Traveler-364, Revision 0 (Reference 1), submitted to the NRC by the Technical Specifications Task Force (TSTF). This TSTF traveler was approved by the NRC in a letter dated June 16, 2000, to Mr. James Davis, Director Operations Department, Nuclear Energy Institute. This change has already been implemented for the Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station during their recent conversion to the ISTS, approved March 30, 2001.

This request is subdivided as follows.

1. Attachment A gives a description and safety analysis of the proposed changes.
2. Attachment B includes the marked-up Operating License and TS pages with the requested changes indicated.
3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (a)(1) which provides information supporting a finding of no significant hazards consideration in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (c).
4. Attachment D provides information supporting an Environmental Assessment.

These proposed changes have been reviewed by the Plant Operations Review Committees or the Qualified Technical Reviewer at each of the stations, as appropriate, and approved by the Nuclear Safety Review Board.

We request approval of these proposed changes by June 30, 2002, with the changes being implemented within 60 days of issuance of the approved amendment.

We are notifying the States of Illinois, New Jersey, and Pennsylvania of this application for changes to the TS and Operating License by transmitting a copy of this letter and its attachments to the designated state official.

Should you have any questions concerning this letter, please contact Mr. T. W. Simpkin at (630) 663-3019.

Respectfully,



R. M. Krich
Director – Licensing
Mid-West Regional Operating Group

Attachments:

- Affidavit
- Attachment A: Description and Safety Analysis for Proposed Changes
- Attachment B: Marked-up Pages for Proposed Changes
- Attachment C: Information Supporting a Finding of No Significant Hazards Consideration
- Attachment D: Information Supporting An Environmental Assessment

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Clinton Power Station
NRC Senior Resident Inspector – Limerick Generating Station
NRC Senior Resident Inspector – Oyster Creek Generating Station
NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
NRC Senior Resident Inspector – Three Mile Island Nuclear Station
NRC Senior Resident Inspector – Zion Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety
Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental Protection
Director, Bureau of Radiation Protection – Pennsylvania Department of Environmental Resources

STATE OF ILLINOIS)
COUNTY OF DUPAGE)

IN THE MATTER OF)

EXELON GENERATION COMPANY, LLC) Docket Numbers

BRAIDWOOD STATION, UNITS 1 AND 2) 50-456 and 50-457
BYRON STATION, UNITS 1 AND 2) 50-454 and 50-455
LIMERICK GENERATING STATION, UNITS 1 AND 2) 50-352 and 50-353
PEACH BOTTOM ATOMIC POWER STATION,)
UNITS 2 AND 3) 50-277 and 50-278
ZION NUCLEAR POWER STATION, UNITS 1 AND 2) 50-295 and 50-304

AND

AMERGEN ENERGY COMPANY, LLC)

CLINTON POWER STATION, UNIT 1) 50-461
OYSTER CREEK GENERATING STATION) 50-219
THREE MILE ISLAND NUCLEAR STATION, UNIT 1) 50-289

SUBJECT: Request for Amendment to Operating License Conditions and Technical Specifications Administrative Controls to Incorporate Revision to 10 CFR 50.59, "Changes, tests, and experiments"

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



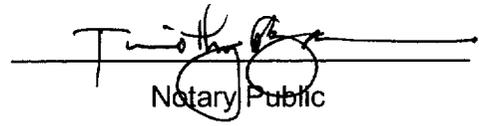
J. Skolds
Chief Operating Officer, Nuclear
Exelon Generation Company, LLC

Chief Executive Officer
AmerGen Energy Company, LLC

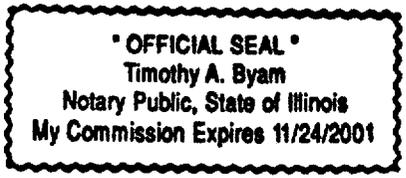
Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 9th day of

July, 2001.



Notary Public



Attachment A
DESCRIPTION AND SAFETY ANALYSIS
FOR THE PROPOSED CHANGES
1 of 5

A. SUMMARY OF THE PROPOSED CHANGES

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, and AmerGen Energy Company, LLC (i.e., AmerGen) proposes changes to Appendix A, Technical Specifications (TS), for the following Operating Licenses.

EGC

Braidwood Station, Units 1 and 2	Facility Operating License Nos. NPF-72 and NPF-77
Byron Station, Units 1 and 2	Facility Operating License Nos. NPF-37 and NPF-66
Limerick Generating Station, Units 1 and 2	Facility Operating License Nos. NPF-39 and NPF-85
Peach Bottom Atomic Power Station, Units 2 and 3	Facility Operating License Nos. DPR-44 and DPR-56
Zion Nuclear Power Station, Units 1 and 2	Facility Operating License Nos. DPR-39 and DPR-48

AmerGen

Clinton Power Station, Unit 1	Facility Operating License No. NPF-62
Oyster Creek Generating Station	Facility Operating License No. DPR-16
Three Mile Island Nuclear Station, Unit 1	Facility Operating License No. DPR-50

In addition Exelon proposes to change a condition of Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station. This change has already been implemented for the Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station during their recent conversion to the Improved Standard Technical Specifications (ISTS), approved March 30,2001.

The proposed changes are conforming TS changes that are being made to provide consistency with the changes to 10 CFR 50.59, "Changes, tests, and experiments," as published in the Federal Register (FR) Volume 64, beginning on page 53582 (i.e., 64 FR 53582), dated October 4, 1999. Specifically, the changes replace the terms "safety evaluation" with "10 CFR 50.59 evaluation" and "unreviewed safety question" with "requires NRC approval pursuant to 10 CFR 50.59."

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

The operating license and administrative controls section of TS contain required reviews that use the 10 CFR 50.59 regulation to provide the licensee a means for evaluating proposed changes to determine whether the change requires prior NRC review and approval. The following provides the referenced review processes.

The Braidwood Station, Byron Station, Clinton Power Station (CPS), and Peach Bottom Atomic Power Station (PBAPS) TS reflect the ISTS and are referred to as the Improved TS (ITS). The Administrative Controls Section of ISTS provides a Technical

Attachment A
DESCRIPTION AND SAFETY ANALYSIS
FOR THE PROPOSED CHANGES
2 of 5

Specification Bases Control Program. This program provides a means for processing changes to the Bases of the TS. This program allows licensees to make changes to the Bases without prior NRC approval provided the changes do not involve either (a) a change in the TS incorporated in the license; or (b) a change to the Updated Final Safety Analysis Report or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.

The Limerick Generating Station (LGS) TS are based on the previous Standard Technical Specifications provided in NUREG-0123, "Standard Technical Specifications for General Electric Boiling Water Reactors." The Administrative Controls Section of TS (i.e., Section 6) has the following program requirements.

- TS Section 6.5.1.6 lists the Plant Operations Review Committee's (PORC's) responsibilities. TS Section 6.15.1.6.a requires that PORC review (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation.
- TS Section 6.5.1.7 states the actions to be taken by PORC. TS Section 6.5.1.7.b states that PORC shall render determinations in writing with regard to whether or not each item considered in Specification 6.5.1.6.b through f constitutes an unreviewed safety question.
- TS Section 6.5.3, "Program/Procedure Review and Approval," states the requirements for review and approval of programs and procedures. TS Section 6.5.3.2 requires that "Each new program, procedure or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1."

TS Section 6.5.3.3 requires that, "If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ), and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change."

Three Mile Island and Oyster Creek employ custom TS, and have the following requirements in the Administrative Controls Section of TS (i.e., Section 6).

Attachment A
DESCRIPTION AND SAFETY ANALYSIS
FOR THE PROPOSED CHANGES
3 of 5

- TS Section 6.5.1 lists the activities requiring a technical review. Step 6.5.1.12 requires that reviews being conducted provide a determination, in writing with regard to whether or not the activity constitutes an unreviewed safety question.
- TS Section 6.5.2.5, "Responsibilities," identifies the subjects requiring independent review by the functionally assigned divisions. Sub-item (a) requires that: "Written safety evaluations of changes in the facility as described in the Safety Analysis Report, of changes in procedure as described in the Safety Analysis Report, and of test or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10CFR50.59(a)(1)." This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10CFR50.59(a)(2). Such reviews need not be performed prior to implementation." Sub-item (b) requires that: "Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an reviewed safety question as defined in 10CFR50.59(c)"

Zion Nuclear Power Station have Permanently Defueled Technical Specifications and have the following requirements in the Administrative Controls Section of TS (i.e., Section 5).

- TS Section 5.6.4, "Technical Specification (TS) Bases Control Program," is identical to the TS Bases Control program discussed above for the Byron Station, Braidwood Station, CPS, and PBAPS.
- TS Section 5.9.1, "Qualified Technical Review," provides requirements for reviews to be conducted by a Qualified Technical Reviewer. Sub-item 5.9.1.c.1 requires that safety evaluations for changes in the facility as described in the Defueled Safety Analysis Report (DSAR), changes in procedures as described in the DSAR, and tests and experiments not described in the DSAR be reviewed by the Qualified Technical Reviewer to verify that such actions do not involve a change to the Technical Specifications or will not involve an unreviewed safety question as defined in 10 CFR 50.59. Sub-item 5.9.1.c.2 requires that proposed changes to the programs required by Specification 5.6 be reviewed by a Qualified Technical Reviewer to verify that such changes do not involve a change to the Technical Specifications and will involve an unreviewed safety question as defined in 10 CFR 50.59.
- TS Section 5.9.2. "Station Review Committee (SRC)," provides the responsibilities for the SRC. 5.9.2.f delineates the review requirements for the SRC. Sub-item 1 requires the safety evaluations for new documents or changes to documents completed under the provisions of 10 CFR 50.59 be reviewed to verify that such actions do not involve an unreviewed safety question as defined in 10 CFR 50.59. Sub-item 2 requires that changes to structures, systems, or components important to safe safe storage of nuclear fuel be reviewed to verify that such changes do not involve an unreviewed safety question as defined in 10 CFR 50.59. Sub-item 3 requires that tests or experiments involving the safe storage of nuclear fuel be reviewed to verify

Attachment A
DESCRIPTION AND SAFETY ANALYSIS
FOR THE PROPOSED CHANGES
4 of 5

that such test or experiments do not involve an unreviewed safety question as defined in 10 CFR 50.59.

- TS Section 5.9.3, "Records," require that written records of reviews be maintained. Sub-item a requires that determinations of whether each item considered under Specifications 5.9.2.f.1 through 5.9.2.f.3 involves an unreviewed safety question as defined in 10 CFR 50.59 be maintained.

In addition to the requirements in the Administrative Controls Section of the TS, the PBAPS Operating License, in License Condition 3.B requires the following.

"In the event of any modification of the NPDES [National Pollutant Discharge Elimination System] Permit related to thermal discharges or the establishment (or amendment) of alternative effluent limitations established pursuant to Section 316 of the Federal Water Pollution Control Act, the licensees shall inform the NRC and analyze any associated changes in or to the Station, its components, its operation or in the discharge of effluents therefrom. If such change would entail any modification to this license, or any Technical Specifications which are part of this license, or present an unreviewed safety question or involve an environmental impact different than analyzed in the Final Environmental Statement, the licensees shall file with the NRC, as applicable, an appropriate analysis of any such change on facility safety, and/or an analysis of any such change on the environmental impacts and on the overall cost-benefit balance for facility operation as set forth in the Final Environmental Statement and a request for an amendment to the operating license, if required by the Commission's regulations. ..."

C. BASES FOR THE CURRENT REQUIREMENTS

The purpose of each of the requirements listed in section B is to ensure that necessary reviews of proposed changes are performed. The purpose of the Administrative Control requirements or license condition is to provide the bases for the licensee to make changes and perform a determination of whether NRC approval is required prior to implementation of the proposed change. This determination is done by evaluating the proposed change activity using the 10 CFR 50.59 review process.

D. NEED FOR REVISION OF THE REQUIREMENTS

The revised 10 CFR 50.59 rule, published in 64 FR 53582 on October 4, 1999, eliminated the term "unreviewed safety question." This terminology was replaced with "requires NRC approval pursuant to 10 CFR 50.59." In addition, the rule change no longer refers to the 10 CFR 50.59 evaluation to be a "safety evaluation." Therefore, these proposed changes to the TS and Operating License conditions are required to conform to and be consistent with the revised 10 CFR 50.59 rule.

E. DESCRIPTION OF THE PROPOSED CHANGES

Mark-ups for each of these proposed changes are provided in Attachment B.

Attachment A
DESCRIPTION AND SAFETY ANALYSIS
FOR THE PROPOSED CHANGES
5 of 5

For each of the sections referenced in Section B of this Attachment, the term "safety evaluation," will be replaced with "evaluation" or "10 CFR 50.59 evaluation," and the term "unreviewed safety question," will be replaced with "requires NRC approval pursuant to 10 CFR 50.59."

The changes to the Technical Specification Bases Control Program in the plants with ITS, will be done in accordance with the NRC approved Technical Specification Task Force (TSTF) Traveler-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Revision 0, as amended by the Westinghouse Owners Group (WOG) editorial change WOG-ED-24.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

The NRC's Final Rule, dated October 4, 1999, revising 10 CFR 50.59 affects the wording of the various sections of the TS Administrative Controls Section and License Condition 3.B of PBAPS Operating License. In the rule revision, the NRC removed the term "unreviewed safety question," and deleted use of the term "safety evaluation." The proposed TS and Operating License changes merely remove the reference to "unreviewed safety question," and replace it with the appropriate action, and replace the reference to "safety evaluation," with "evaluation," or "10 CFR 50.59 evaluation," to provide conformance with the revised 10 CFR 50.59 rule. The proposed changes do not change the actions or results of any of the referenced TS Administrative Control Sections or the PBAPS Operating License Condition, and still maintain the requisite reviews under 10 CFR 50.59 to determine if changes would require NRC approval prior to implementation of the change. The revised 10 CFR 50.59 rule continues to provide the process necessary to determine if changes, tests or experiments may be conducted by the licensee without prior NRC approval.

G. IMPACT ON PREVIOUS SUBMITTALS

We have reviewed the proposed changes regarding impact on any previous submittals, and have determined that there is no impact on any outstanding license amendment requests.

H. SCHEDULE REQUIREMENTS

We request approval of these proposed changes by June 30, 2002, with the changes being implemented within 60 days of approval of the license amendment.

I. REFERENCES

TSTF Traveler-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Revision 0, as amended by WOG ED-24.

ATTACHMENT B
MARKED-UP TS PAGES AND LICENSE PAGES FOR PROPOSED CHANGES

REVISED TS PAGES

Braidwood, Units 1 and 2
5.5-22

Byron, Units 1 and 2
5.5.22

Clinton Power Station, Unit 1
5.0-16

Limerick Generating Station, Unit 1
6-8
6-12
6-12a

Limerick Generating Station, Unit 2
6-8
6-12
6-12a

Oyster Creek Generating Station
6-4
6-6

Peach Bottom Atomic Power Station, Unit 2
5.0-15

Peach Bottom Atomic Power Station, Unit 3
5.0-15

Three Mile Island Nuclear Station, Unit 1
6-5
6-6

Zion Nuclear Power Station, Units 1 and 2
5-13
5-19
5-21
5-22

REVISED LICENSE PAGES

Peach Bottom Atomic Power Station, Unit 2
Page 7

Peach Bottom Atomic Power Station, Unit 3
Page 7

5.5 Programs and Manuals

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not ~~involve~~ ^{require} either of the following:
 1. a change in the TS incorporated in the license; or
 2. ~~a change to the UFSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.~~ ^{requires NRC approval pursuant to}
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) as modified by approved exemptions.

5.5 Programs and Manuals

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not ~~involve~~ ^{require} either of the following:
 1. a change in the TS incorporated in the license; or
 2. ~~a change to the UFSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.~~ ^{requires NRC approval pursuant to}
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) as modified by approved exemptions.

5.5 Programs and Manuals (continued)

5.5.11 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not ~~involve~~ either of the following:
 1. A change in the TS incorporated in the license; or
 2. ~~A change to the USAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.~~
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the USAR.
- d. Proposed changes that meet the criteria of either Specification 5.5.11.b.1 or Specification 5.5.11.b.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

require

requires NRC approval pursuant to

5.5.12 Ultimate Heat Sink (UHS) Erosion, Sediment Monitoring, and Dredging Program

A program to provide maintenance on the UHS in the event inspections of the UHS dam, its abutments, or the UHS shoreline indicate erosion or local instability. This program shall ensure that the UHS is maintained in such a way as to achieve the following objectives:

- a. During normal operation, there will be a volume of water in the UHS below elevation 675 sufficient to receive the sediment load from a once-in-25-year flood event; and
- b. Still be adequate to maintain the plant in a safe-shutdown condition for 30 days under meteorological conditions of the severity suggested by Regulatory Guide 1.27.

(continued)

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.
- n. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. constitutes an unreviewed safety question.

LIMERICK - UNIT 1

6-8

Amendment No. 46, 47, 404, 131

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requires NRC approval pursuant to 10CFR50.59.

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

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10 CFR 50.59

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ) and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

obtain

NRC approval is required

requires NRC approval pursuant to 10 CFR 50.59

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Director or Manager shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.
- n. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. ~~constitutes an unreviewed safety question.~~

LIMERICK - UNIT 2

6-8

requires NRC approval pursuant to 10CFR50.59.

Amendment No. 40, 68, 92

NOV 16 1998

ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports shall be forwarded to the Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 ~~safety~~ evaluation is required. If a 10 CFR 50.59 ~~safety~~ evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Director or Manager or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

ADMINISTRATIVE CONTROLS

10 CFR 50.59

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager shall render a determination in writing of whether or not, the new program, procedure, or change thereto involves an unreviewed safety question (USQ) and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

NRC approval is required, obtain

requires NRC approval pursuant to 10 CFR 50.59

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Director or Manager shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating Station.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within the 14 days of the violation.

- 6.5.1.2 Proposed changes to the Appendix "A" Technical Specifications shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group who prepared the change.
- 6.5.1.3 Proposed modifications, that affect nuclear safety, to facility structures, systems and components shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification but may be from the same division as the individual who designed the modification.
- 6.5.1.4 Proposed tests and experiments that affect nuclear safety shall be reviewed by a knowledgeable individual(s)/group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments.
- 6.5.1.5 Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, shall be reviewed by a knowledgeable individual(s)/group other than the individual/group which performed the investigation.
- 6.5.1.6 Events requiring 24-hour written notification to the Commission shall be reviewed by an individual/group other than the individual/group which prepared the report.
- 6.5.1.7 Special reviews, investigations or analyses and reports thereon as requested by the Vice President - Oyster Creek shall be performed by a knowledgeable individual(s)/group.
- 6.5.1.8 The Security Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.9 The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.10 Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation shall be performed by a knowledgeable individual(s)/group. Recommendations and disposition of the corrective action to prevent recurrence shall be sent to the Vice President - Oyster Creek.
- 6.5.1.11 Major changes to radwaste systems shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.12 Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.4 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel. Individuals responsible for reviews considered under 6.5.1.1, 6.5.1.3, and 6.5.1.4 shall render determinations in writing with regard to whether or not 6.5.1.1, 6.5.1.3, and 6.5.1.4 constitute an unreviewed safety question.

NEC approval is required pursuant to 10CFR50.59.

RESPONSIBILITIES

6.5.2.5 The following subjects shall be independently reviewed by the functionally assigned divisions:

- a. Written ~~safety~~ ^(UFSAR) evaluations of changes in the facility as described in the ~~Safety Analysis Report~~ ^{Updated Final!} of changes in procedures as described in the ~~Safety Analysis Report~~ ^{UFSAR}, and of tests or experiments not described in the ~~Safety Analysis Report~~, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests or experiments did not involve a change in the Technical Specifications or ~~an unreviewed safety question as defined in 10 CFR 50.59(a)(2)~~. Such reviews need not be performed prior to implementation. ^{require NRC approval pursuant to 10 CFR 50.59.}
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or ~~an unreviewed safety question as defined in 10 CFR 50.59(e)~~. Matters of this kind shall be reviewed prior to submittal to the NRC. ^{requires NRC approval pursuant to 10 CFR 50.59.}
- c. Proposed changes to Technical Specifications or license amendments related to nuclear safety shall be reviewed prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- e. Written summaries of audit reports in the areas specified in section 6.5.3 and involving safety related functions.
- f. Any other matters involving safe operations of the nuclear power plant which a reviewer deems appropriate for consideration, or which is referred to the independent reviewers.

QUALIFICATIONS

6.5.2.6 The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

RECORDS

6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant department director and the Vice President - Oyster Creek.

5.5 Programs and Manuals

5.5.9 Diesel Fuel Oil Testing Program (continued)

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 - 1. an API gravity or an absolute specific gravity within limits,
 - 2. kinematic viscosity, when required, and a flash point within limits for ASTM 2-D fuel oil, and
 - 3. a clear and bright appearance with proper color or a water and sediment content within limits;
- b. Other properties for ASTM 2-D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
- c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days in accordance with ASTM D2276, Method A, except that the filters specified in the ASTM method may have a nominal pore size of up to three (3) microns.

5.5.10 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that ~~involves an unreviewed safety question as defined in~~ 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

(continued)

5.5 Programs and Manuals

5.5.9 Diesel Fuel Oil Testing Program (continued)

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 - 1. an API gravity or an absolute specific gravity within limits,
 - 2. kinematic viscosity, when required, and a flash point within limits for ASTM 2-D fuel oil, and
 - 3. a clear and bright appearance with proper color or a water and sediment content within limits;
- b. Other properties for ASTM 2-D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
- c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days in accordance with ASTM D2276, Method A, except that the filters specified in the ASTM method may have a nominal pore size of up to three (3) microns.

5.5.10 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that ~~involves an unreviewed safety question as defined in~~ 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

(continued)

requires NRC approval pursuant to

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- 6.5.1.9 The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.10 A knowledgeable individual(s)/group shall review every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports to the Vice President-TMI Unit 1 covering evaluations, recommendations and disposition of the corrective action to prevent recurrence.
- 6.5.1.11 Major changes to radwaste systems shall be reviewed by a knowledgeable individual(s)/group other than the individuals(s)/group which prepared them.
- 6.5.1.12 Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.4 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel. Individuals responsible for reviews considered under 6.5.1.1, 6.5.1.3, and 6.5.1.4 shall render determinations in writing with regard to whether or not ~~6.5.1.1, 6.5.1.3, and 6.5.1.4 constitute an unreviewed safety question.~~

NEC approval is required pursuant to 10CFR50.59.

RECORDS

- 6.5.1.13 Written records of activities performed under Specifications 6.5.1.1 through 6.5.1.11 shall be maintained.

QUALIFICATIONS

- 6.5.1.14 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS 3.1 of 1978 Section 4.6, or 4.4 for applicable disciplines, or have 7 years of appropriate experience in the field of his specialty. Credit toward experience will be given for advanced degrees on a one-to-one basis up to a maximum of two years. Responsible Technical Reviewers shall be designated in writing.

6.5.2 INDEPENDENT SAFETY REVIEW FUNCTION

- 6.5.2.1 The director of each department shall be responsible for ensuring the independent safety review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility, as assigned in the Review and Approval Matrix.
- 6.5.2.2 Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work.
- 6.5.2.3 The licensee shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

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- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical engineering
- i. Electrical engineering
- j. Administrative controls and quality assurance practices
- k. Emergency plans and related organization, procedures and equipment
- l. Other appropriate fields associated with the unique characteristics of TMI-1.

6.5.2.4 Consultants may be utilized as determined by the cognizant department director to provide expert advice.

RESPONSIBILITIES

6.5.2.5 The following subjects shall be independently reviewed by the functionally assigned divisions:

- a. *(Final)* Written ~~safety~~ *(UFSAR)* evaluations of changes in the facility as described in the *(Updated)* Safety Analysis Report of changes in procedures as described in the ~~Safety Analysis Report~~ and of tests or experiments not described in the ~~Safety Analysis Report~~ which are completed without prior NRC approval under the provisions of 10CFR50.59(a)(1). This review is to verify that such changes, tests or experiments did not involve a change in the Technical Specifications or ~~an unreviewed safety question as defined in 10CFR 50.59(a)(2)~~. Such reviews need not be performed prior to implementation. *Require NRC approval pursuant to 10CFR 50.59.*
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or ~~an unreviewed safety question as defined in 10CFR 50.59(c)~~. Matters of this kind shall be reviewed prior to submittal to the NRC. *Requires NRC approval pursuant to 10CFR 50.59.*
- c. Proposed changes to Technical Specifications or license amendments related to nuclear safety shall be reviewed prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.
- e. Written summaries of audit reports in the areas specified in Section 6.5.3 and involving safety related functions.

5.6 Programs and Manuals

5.6.4 Technical Specification (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:
 1. A change in the TS incorporated in the license; or
 2. A change to the DSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the DSAR.
- d. Proposed changes that meet the criteria of b(1) or b(2) above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) as modified by approved exemptions.

REQUIRE

requires NRC approval pursuant to

5.0 ADMINISTRATIVE CONTROLS

5.9 Reviews

5.9.1 Qualified Technical Review

Thorough reviews of the documents specified below shall be conducted by a Qualified Technical Reviewer. Persons performing these reviews shall be knowledgeable in the subject area being reviewed. Qualified Technical Reviews must be completed prior to implementation of proposed activities.

- a. Qualified Technical Reviewers shall be individuals without direct responsibility for the document under review; these reviewers may be from the same functionally cognizant organization as the individual or group performing the original work.
- b. Qualified Technical Reviewers shall have at least 5 years of professional experience and either a Bachelor's degree in Engineering or the Physical Sciences or shall have equivalent qualifications evaluated on a case by case basis and approved by the Decommissioning Plant Manager. The Decommissioning Plant Manager shall document the appointment of Qualified Technical Reviewers.
- c. The following subjects shall be independently reviewed by a Qualified Technical Reviewer:
 1. 10 CFR 50.55 Safety evaluations for changes in the facility as described in the DSAR, changes in procedures as described in the DSAR, and tests or experiments not described in the DSAR to verify that such actions do not involve a change to the Technical Specifications or will not involve an unreviewed safety question as defined in 10 CFR 50.59; *require NRC approval pursuant to*
 2. Proposed changes to the programs required by Specification 5.6, to verify that such changes do not involve a change to the Technical Specifications and will not involve an unreviewed safety question as defined in 10 CFR 50.59; and
 3. Proposed changes to the license, Technical Specifications, or Bases.

(continued)

5.9 Reviews

5.9.2 Station Review Committee (SRC) (continued)

f. The SRC shall be responsible for reviewing:

1. The ~~safety~~ evaluations for new documents or changes to documents completed under the provisions of 10 CFR 50.59 to verify that such actions do not ~~involve an unreviewed safety question as defined in~~ 10 CFR 50.59. This review may be completed after implementation of the affected procedure; *require NRC approval pursuant to*
2. Changes to structures, systems, or components important to the safe storage of nuclear fuel to verify that such changes do not ~~involve an unreviewed safety question as defined in~~ 10 CFR 50.59. This review may be completed after implementation of the change;
3. Tests or experiments involving the safe storage of nuclear fuel to verify that such tests or experiments do not ~~involve an unreviewed safety question as defined in~~ 10 CFR 50.59. This review may be completed after performance of the test or experiment; *require NRC approval pursuant to*
4. Proposed changes to the license, Technical Specifications, or Bases;
5. Violations of codes, regulations, orders, license requirements, or internal procedures/instructions having nuclear safety significance;
6. Indications of unanticipated deficiencies in any aspect of design or operation of structures, systems, or components that could affect safe storage of nuclear fuel;
7. Significant accidental, unplanned, or uncontrolled radioactive releases, including corrective action(s) to prevent recurrence;

(continued)

5.9 Reviews

5.9.2 Station Review Committee (SRC) (continued)

8. Significant operating abnormalities or deviations from normal and expected performance of equipment that affect safe storage of nuclear fuel;
9. Internal and external experience information related to the safe storage of nuclear fuel that may indicate areas for improving facility safety; and
10. Reportable Events.

Reports or records of these reviews shall be forwarded to the Decommissioning Plant Manager within 30 days after completion of the review.

5.9.3 Records

Written records of reviews shall be maintained. As a minimum, these records shall include:

- a. Results of the activities conducted under the provisions of Specifications 5.9.1 and 5.9.2; and
- b. Determination of whether each item considered under Specifications 5.9.2.f.1 through 5.9.2.f.3 ~~involves an unreviewed safety question as defined in~~ 10 CFR 50.59.

requires NRC approval pursuant to

require NRC approval pursuant to 10CFR 50.59

established pursuant to Section 316 of the Federal Water Pollution Control Act, the licensees shall inform the NRC and analyze any associated changes in or to the Station, its components, its operation or in the discharge of effluents therefrom. If such change would entail any modification to this license, or any Technical Specifications which are part of this license, or present an unreviewed safety question or involve an environmental impact different than analyzed in the Final Environmental Statement, the licensees shall file with the NRC, as applicable, an appropriate analysis of any such change on facility safety, and/or an analysis of any such change on the environmental impacts and on the overall cost-benefit balance for facility operation set forth in the Final Environmental Statement and a request for an amendment to the operating license, if required by the Commission's regulations. As used in this Condition 3.B, Final Environmental Statement means the NRC Staff Final Environmental Statement related to Operation of Peach Bottom Atomic Power Station Units Nos. 2 and 3 dated April 1973, as modified by (1) the Initial Decision of the Atomic Safety and Licensing Board dated September 14, 1973, (2) the Supplemental Initial Decision of the Atomic Safety and Licensing Board dated June 14, 1974, (3) the Decision of the Atomic Safety and Licensing Appeal Board dated July 5, 1974, (4) the Memorandum and Order of the Commission dated August 8, 1974, (5) any further modification resulting from further review by the Appeal Board and by the Commission, if any, and (6) any Environmental Impact Appraisal which has been or may be issued by the NRC since the FES was published in April 1973.

- 4. This license is effective as of the date of issuance and shall expire at midnight on August 8, 2013.

FOR THE ATOMIC ENERGY COMMISSION
Original Signed by R. C. DeYoung, for
A. Giambusso, Deputy Director
for Reactor Projects
Directorate of Licensing

Attachments:
Appendices A and B -
Technical Specifications

Date of Issuance: October 25, 1973

3. This license is subject to the following conditions for the protection of the environment:

A. To the extent matters related to thermal discharges are treated therein, operation of Peach Bottom Atomic Power Station Unit 3 will be governed by NPDES Permit No. PA 0009733, as now in effect and as hereafter amended. Questions pertaining to conformance thereto shall be referred to and shall be determined by the NPDES Permit issuing or enforcement authority, as appropriate.

B. In the event of any modification of the NPDES Permit related to thermal discharges or the establishment (or amendment) of alternative effluent limitations established pursuant to Section 316 of the Federal Water Pollution Control Act, the licensees shall inform the NRC and analyze any associated changes in or to the Station, its components, its operation or in the discharge of effluents therefrom. If such change would entail any modification to this license, or any Technical Specifications which are part of this license, or ~~present an unreviewed safety question~~ or involve an environmental impact different than analyzed in the Final Environmental Statement, the licensees shall file with the NRC, as applicable, an appropriate analysis of any such change on facility safety, and/or an analysis of any such change on the environmental impacts and on the overall cost-benefit balance for facility operation set forth in the Final Environmental Statement and a request for an amendment to the operating license, if required by the Commission's regulations. As used in this Condition 3.B, Final Environmental Statement means the NRC Staff Final Environmental Statement related to Operation of Peach Bottom Atomic Power Station Units Nos. 2 and 3 dated April 1973, as modified by (1) the Initial Decision of the Atomic Safety and Licensing Board dated September 14, 1973, (2) the Supplemental Initial Decision of the Atomic Safety and Licensing Board dated June 14, 1974, (3) the Decision of the Atomic Safety and Licensing Appeal Board dated July 5, 1974, (4) the Memorandum and Order of the Commission dated August 8, 1974, (5) any further modification resulting from further review by the Appeal Board and by the Commission, if any, and (6) any Environmental Impact Appraisal which has been or may be issued by the NRC since the FES was published in April 1973.

Require NRC approval pursuant to 10CFR50.59

4. This license is effective as of the date of issuance and shall expire at midnight on July 2, 2014.

FOR THE ATOMIC ENERGY COMMISSION

Original Signed by Roger Boyd, for

A. Giambusso, Deputy Director
for Reactor Projects
Directorate of Licensing

Attachments:
Amended pages to Appendices A and B
DPR-44 & DPR-56 Technical
Specifications

Date of Issuance: July 2, 1974

ATTACHMENT C
INFORMATION SUPPORTING A FINDING OF
NO SIGNIFICANT HAZARDS CONSIDERATION
1 of 2

According to 10 CFR 50.92, "Issuance of Amendment," paragraph (c) a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated; or,
- (2) Create the possibility of a new or different kind of accident from any previously analyzed; or,
- (3) Involve a significant reduction in a margin of safety.

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, and AmerGen Energy Company, LLC (i.e., AmerGen) proposes changes to Appendix A, Technical Specifications (TS), for the following Operating Licenses.

EGC

Braidwood Station, Units 1 and 2	Facility Operating License Nos. NPF-72 and NPF-77
Byron Station, Units 1 and 2	Facility Operating License Nos. NPF-37 and NPF-66
Limerick Generating Station, Units 1 and 2	Facility Operating License Nos. NPF-39 and NPF-85
Peach Bottom Atomic Power Station, Units 2 and 3	Facility Operating License Nos. DPR-44 and DPR-56
Zion Nuclear Power Station, Units 1 and 2	Facility Operating License Nos. DPR-39 and DPR-48

AmerGen

Clinton Power Station, Unit 1	Facility Operating License No. NPF-62
Oyster Creek Generating Station	Facility Operating License No. DPR-16
Three Mile Island Nuclear Station, Unit 1	Facility Operating License No. DPR-50

In addition, Exelon proposes to change a condition of Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station.

The revised 10 CFR 50.59 rule, published in the Federal Register (FR) Volume 64, beginning on page 53582 (i.e., 64 FR 53582), on October 4, 1999, eliminated the term "unreviewed safety question." This terminology was replaced with "requires NRC approval pursuant to 10 CFR 50.59." In addition, the rule change no longer refers to the 10 CFR 50.59 evaluation to be a "safety evaluation." Therefore, these proposed changes to the TS and license conditions are required to conform to and be consistent with the revised 10 CFR 50.59 rule.

Information supporting the determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

ATTACHMENT C
INFORMATION SUPPORTING A FINDING OF
NO SIGNIFICANT HAZARDS CONSIDERATION
2 of 2

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes reflect revision to 10 CFR 50.59, "Changes, tests, and experiments," issued as a Final Rule on October 4, 1999, and do not impact the operation of any system or component assumed in any accident analysis. The proposed changes do not change the requirement to perform a 10 CFR 50.59 review when required by the Technical Specifications Administrative Controls or by a license condition. Due to the administrative nature of these proposed changes there will be no direct impact on the consequences of any accident previously evaluated. Therefore, these proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes are administrative in nature and do not involve a change to the plant design or operation. No new or different types of equipment will be installed as a result of these changes. The proposed changes make the language in the Technical Specifications Administrative Controls and a license condition conform to the revised 10 CFR 50.59 rule, dated October 4, 1999. No new accident modes or equipment failure modes are created by these proposed changes. Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Does the change involve a significant reduction in a margin of safety?

The proposed changes do not have a direct effect on any safety analysis assumptions. The proposed changes are administrative in nature and make the Technical Specifications Administrative Controls and a license condition language conform to the revised 10 CFR 50.59 rule, dated October 4, 1999. Changes to the facility that result in meeting the criteria of 10 CFR 50.59 will still require NRC approval pursuant to 10 CFR 50.59. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Therefore, based on the above evaluation, we have concluded that the proposed changes do not involve a significant hazards consideration.

ATTACHMENT D
INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT
1 of 1

Exelon Generating Company (EGC), LLC and AmerGen Energy Company, LLC (i.e., AmerGen) have evaluated these proposed changes against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." We have determined that these proposed changes are a revision to an administrative requirement as described in 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(10) and therefore meet the criteria for a categorical exclusion. This determination is based on the fact that these proposed changes to the Operating License and Technical Specifications conform with the changes to 10 CFR 50.59, "Changes, tests, and experiments," as published in the Federal Register (FR) Volume 64, beginning on page 53582 (i.e., 64 FR 53582), dated October 4, 1999.

Accordingly, we have concluded that pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.