Exelon Generation
4300 Winfield Road
Warrenville, IL 60555

www.exeloncorp.com

Exelon SM
Nuclear

RS-01-119

August 1, 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

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

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

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

M003

Subject: Request for Technical Specifications Changes to Clarify Requirements for Licensed Operator Qualifications and Training

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) are requesting changes to Appendix A, Technical Specifications (TS) of the facility operating licenses listed above.

The proposed changes will revise, clarify or delete, as appropriate, requirements regarding Facility Staff Qualifications and licensed operator and non-licensed personnel training programs. The requested changes will revise requirements that have been superseded based on licensed operator training programs being accredited by the Institute for Nuclear Power Operations, promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987, and adoption of a systems approach to training as required by 10 CFR 50.120, "Training and qualification of nuclear power plant personnel."

This amendment request is subdivided as follows.

1. Attachment A provides a description and safety analysis of the proposed changes.

2. Attachments B-1 through B-10 provide the marked-up TS pages indicating the proposed changes for the respective stations. Note that there are no associated Bases pages with the proposed changes.

3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.91(a), "Notice for public comment," paragraph (1), which provides information supporting a finding of no significant hazards consideration using the standards in 10 CFR 50.92, "Issuance of amendment," paragraph (c).

4. Attachment D provides information supporting an Environmental Assessment. We have determined that the proposed changes meet the criteria for a categorical exclusion set forth in paragraph (c)(10) of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review."

We request that the NRC review and approve the proposed TS changes by February 1, 2002, to support the continued processing of licensed operator candidates. The proposed TS changes provide the needed flexibility for candidates to complete the licensed operator training program who meet the experience eligibility requirements of an accredited training program consistent with 10 CFR 55.31, "How to apply," paragraph 4; but may not meet the American National Standards Institute (ANSI) or ANSI/American Nuclear Society (ANS) experience requirements referenced in the current TS.

The NRC has previously approved similar license amendment requests for the following nuclear stations: Salem Generating Station, Units 1 and 2, Amendments 136 and 115, approved November 9, 1992; Hope Creek Generating Station, Amendment 56, approved December 21, 1992; Davis Besse, Amendment 177, approved January 19, 1993; Waterford, Unit 3, Amendment 61, approved February 21, 1990; and Vogtle, Unit 1, Amendment 12, approved November 1, 1988.

These proposed changes have been reviewed by each respective station's Plant Operations Review Committee and approved by each respective station's Nuclear Safety Review Board in accordance with the requirements of the EGC and AmerGen Quality Assurance Programs.

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

If you have any questions regarding this matter, please contact J. A. Bauer at (630) 657-2801.

Respectfully,

K. A. Ainger

K. A. Ainger
Director – Licensing
Mid-West Regional Operating Group

Attachments: Affidavit
Attachment A, Description and Safety Analysis for Proposed Changes
Attachment B-1, Marked-up Technical Specifications Page for Proposed Change, Braidwood Station
Attachment B-2, Marked-up Technical Specifications Page for Proposed Change, Byron Station
Attachment B-3, Marked-up Technical Specifications Page for Proposed Change, Clinton Power Station
Attachment B-4, Marked-up Technical Specifications Page for Proposed Change, Dresden Nuclear Power Station
Attachment B-5, Marked-up Technical Specifications Page for Proposed Change, LaSalle County Station
Attachment B-6, Marked-up Technical Specifications Pages for Proposed Change, Limerick Generating Station
Attachment B-7, Marked-up Technical Specifications Pages for Proposed Change, Oyster Creek Generating Station
Attachment B-8, Marked-up Technical Specifications Pages for Proposed Change, Peach Bottom Atomic Power Station
Attachment B-9, Marked-up Technical Specifications Page for Proposed Change, Three Mile Island Nuclear Station

Attachment B-10, Marked-up Technical Specifications Page
for Proposed Change, Quad Cities Nuclear Power Station
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 – Dresden Nuclear Power Station
NRC Senior Resident Inspector – LaSalle County 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 – Quad Cities 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	)	**STN 50-456 AND STN 50-457**
BYRON STATION - UNITS 1 AND 2	)	**STN 50-454 AND STN 50-455**
DRESDEN NUCLEAR POWER STATION UNITS 2 AND 3	)	**50-237 AND 50-249**
LASALLE COUNTY STATION - UNITS 1 AND 2	)	**50-373 AND 50-374**
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**
QUAD CITIES NUCLEAR POWER STATION - UNITS 1 AND 2	)	**50-254 AND 50-265**
AMERGEN ENERGY COMPANY, LLC	)	**Docket Numbers**
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 Technical Specifications Changes to Clarify Requirements for Licensed Operator Qualifications and Training**

AFFIDAVIT

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

K. A. Ainger
Director – Licensing
Mid-West Regional Operating Group

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

for the State above named, this 1st day of

August, 2001.

Notary Public

* OFFICIAL SEAL *
Timothy A. Byam
Notary Public, State of Illinois
My Commission Expires 11/24/2001

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

A. SUMMARY OF 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) are requesting changes to Appendix A, Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, NPF-62, DPR-19, DPR-25, NPF-11, NPF-18, NPF-39, NPF-85, DPR-16, DPR-44, DPR-56, DPR-50, DPR-29, and DPR-30, for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Clinton Power Station (CPS), Unit 1, Dresden Nuclear Power Station (DNPS), Units 2 and 3, LaSalle County Station (LSCS), Units 1 and 2, Limerick Generating Station (LGS), Units 1 and 2, Oyster Creek Generating Station (OCGS), Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Three Mile Island (TMI) Nuclear Station, Unit 1, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively.

The proposed changes will address the following two issues.

1. Revise and clarify the current TS requirements for "Facility Staff Qualifications" for licensed operator qualifications and training that have been superseded based on licensed operator training programs being accredited by the Institute for Nuclear Power Operations (INPO) and the implementation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987. 10 CFR 55 requires that a license applicant "has successfully completed a Commission-approved training program that is based on a systems approach to training . . ." This proposed change is applicable to Byron Station, Braidwood Station, CPS, DNPS, LSCS, OCGS, PBAPS, TMI Nuclear Station, and QCNPS.

2. Delete Section 6.4, "Training," as it is redundant to the requirements of 10 CFR 50.120, "Training and qualification of nuclear power plant personnel" which became effective on May 26, 1993. 10 CFR 50. 120 requires that nuclear power plant licensees establish, implement and maintain a training program derived from a systems approach to training as defined in 10 CFR 55.4, "Definition." This change is applicable to LGS, OCGS, and TMI Nuclear Station.

A complete description of the proposed changes is given in Section E, "Description of the Proposed Changes," of this Attachment. Attachments B-1 through B-10 provide the marked-up TS pages indicating the proposed changes for the respective stations.

Please note that the NRC has previously approved similar license amendment requests for the following nuclear stations: Salem Generating Station, Units 1 and 2, Amendments 136 and 115, approved November 9, 1992; Hope Creek Generating Station, Amendment 56, approved December 21, 1992; Davis Besse, Amendment 177, approved January 19, 1993; Waterford, Unit 3, Amendment 61, approved February 21, 1990; and Vogtle, Unit 1, Amendment 12, approved November 1, 1988.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

The following section describes the current TS requirements for which a change is proposed.

1. Braidwood Station

TS Section 5.3, "Facility Staff Qualifications," Specification 5.3.1 currently states, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exception: either the senior health physics supervisor or lead health physicist, shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975."

2. Byron Station

TS Section 5.3, "Facility Staff Qualifications," Specification 5.3.1 currently states, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exception: either the senior health physics supervisor or lead health physicist, shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975."

3. Clinton Power Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, as modified by Specification 5.2.2.f."

4. Dresden Nuclear Power Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, except for the radiation protection manager, who shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975."

5. LaSalle County Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 currently states in part, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, except the radiation protection manager who shall meet the requirements of 'radiation protection manager' in Regulatory Guide 1.8, September 1975. . . . "

6. Limerick Generating Station

LGS has separate TS for Unit 1 and Unit 2, however, the specification noted below is identical for both units.

TS Section 6.4, "Training," Specification 6.4.1 currently states, "Training programs for the unit staff shall be maintained under the direction of the site training organization.

The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience."

7. Oyster Creek Generating Station

TS Section 6.3, "Facility Staff Qualifications," Specification 6.3.1 currently states, in part, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. . ."

TS Section 6.4, "Training," Specification 6.4.1 currently states, "A retraining program for the operators shall be maintained under the direction of the Manager responsible for plant training and shall meet the requirements and recommendations of 10 CFR 55. Replacement training programs, the content of which shall meet the requirements of 10 CFR Part 55, shall be conducted under the direction of the Manager responsible for plant training for licensed operators and Senior Reactor Operators."

8. Peach Bottom Atomic Power Station

PBAPS has separate TS for Unit 2 and Unit 3, however, the specification noted below is identical for both units.

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, for comparable positions described in the UFSAR, except for the Manager-Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975."

9. Three Mile Island Nuclear Station

TS Section 6.3, "Facility Staff Qualifications," Specification 6.3.1 currently states in part, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall also meet the requirements of 10 CFR 55. . . "

TS Section 6.4, "Training," Specification 6.4.1 currently states, "A retraining and replacement training program for the unit staff shall be shall be maintained under the direction of the plant training manager and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977. Licensed operator training shall also meet the requirements of 10 CFR Part 55."

10. Quad Cities Nuclear Power Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-

1971, except for the radiation protection manager or lead radiation protection technician, who shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975."

C. BASES FOR THE CURRENT REQUIREMENTS

The existing TS requirements for Facility Staff Qualifications and licensed operator and non-licensed personnel training programs are based on NRC endorsed industry standards to ensure that a licensee's staff is appropriately qualified and trained for their respective positions. These requirements were developed based on the pre-1987 revision of 10 CFR 55 and prior to the 1993 edition of 10 CFR 50.120.

Current licensed operator qualifications and the licensed operator retraining and replacement programs must also comply with the requirements of 10 CFR 55. The non-licensed personnel training programs must comply with the requirements of 10 CFR 50.120.

D. NEED FOR REVISION OF THE REQUIREMENTS

We request that the NRC review and approve the proposed TS changes to revise, clarify or delete, as appropriate, requirements regarding Facility Staff Qualifications and licensed operator and non-licensed personnel training programs. The requested changes would revise or delete superseded requirements based on accreditation of our licensed operator training programs by the INPO, promulgation of the revised 10 CFR 55 which became effective on May 26, 1987, and adoption of a systems approach to training as required by 10 CFR 50.120 for non-licensed personnel.

In addition, approval of the proposed change to the licensed operator qualification requirements will support the continued processing of licensed operator candidates. The proposed TS changes provide the needed flexibility for candidates to complete the licensed operator training program who meet the experience eligibility requirements of an accredited training program consistent with 10 CFR 55.31, "How to apply," paragraph 4; but may not meet the American National Standards Institute (ANSI) or ANSI/American Nuclear Society (ANS) experience requirements referenced in the current TS.

E. DESCRIPTION OF THE PROPOSED CHANGES

The following section describes the proposed administrative changes to the TS requirements.

1. Braidwood Station

TS Section 5.3, "Facility Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI N18.1-1971. Specification 5.3.1 will be revised to state:

> "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exceptions: either the senior health physics supervisor or lead health physicist, shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10 CFR 55."

2. Byron Station

TS Section 5.3, "Facility Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI N18.1-1971. Specification 5.3.1 will be revised to state:

> "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exceptions: either the senior health physics supervisor or lead health physicist, shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10 CFR 55."

3. Clinton Power Station

TS Section 5.3, "Facility Unit Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI/ANS 3.1-1978. Also, the reference to Specification 5.2.2.f is redundant and unnecessary and will be deleted. Specification 5.3.1 will be revised to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, with the following exception: the licensed operators shall comply with the requirements of 10 CFR 55."

4. Dresden Nuclear Power Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI N18.1-1971. Specification 5.3.1 will be revised to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exceptions: the radiation protection manager shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10 CFR 55."

5. LaSalle County Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI N18.1-1971. Specification 5.3.1 will be revised to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exceptions: the radiation protection manager shall meet the requirements of 'radiation protection manager' in Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10 CFR 55. . . "

6. Limerick Generating Station

LGS has separate TS for Unit 1 and Unit 2, however, the proposed change is identical for both units.

TS Section 6.4, "Training," Specification 6.4.1 is being deleted as it is redundant to the requirements of 10 CFR 55 and 10 CFR 50.120.

7. Oyster Creek Generating Station

TS Section 6.3, "Facility Staff Qualifications," Specification 6.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI/ANS 3.1-1978. In addition, the statement "Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees," is being deleted. Specification 6.3.1 will be revised, in part, to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications with the following exception: the licensed operators shall comply with the requirements of 10 CFR 55. . ."

TS Section 6.4, "Training," Specification 6.4.1 is being deleted as it is redundant to the requirements of 10 CFR 55.

8. Peach Bottom Atomic Power Station

PBAPS has separate TS for Unit 2 and Unit 3, however, the proposed change is identical for both units.

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI N18.1-1971. Specification 5.3.1 will be revised to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, for comparable positions described in the UFSAR, with the following exceptions: the Manager-Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10 CFR 55."

9. Three Mile Island Nuclear Station

TS Section 6.3, "Unit Staff Qualifications," Specification 6.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of, not in addition to, ANSI/ANS 3.1-1978. Specification 5.3.1 will be revised, in part, to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications, with the following exception: licensed operators shall comply with the requirements of 10 CFR 55. . . "

TS Section 6.4, "Training," Specification 6.4.1 is being deleted as it is redundant to the requirements of 10 CFR 55 and 10 CFR 50.120.

10. Quad Cities Nuclear Power Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires licensed operators to comply with the requirements of 10 CFR 55 in lieu of ANSI N18.1-1971. Specification 5.3.1 will be revised to state:

> "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exceptions: the radiation protection manager or lead radiation protection technician, shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10 CFR 55."

F. SAFETY ANALYSES OF THE PROPOSED CHANGES

As previously noted, the proposed changes address the following two issues.

1. Revise and clarify the current TS requirements for "Facility Staff Qualifications" for licensed operator qualifications and training that have been superseded based on licensed operator training programs being accredited by the INPO and the implementation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987. 10 CFR 55 requires that a license applicant "has successfully completed a Commission-approved training program that is based on a systems approach to training . . ." This proposed change is applicable to Byron Station, Braidwood Station, CPS, DNPS, LSCS, OCGS, PBAPS, TMI Nuclear Station, and QCNPS.

2. Delete Section 6.4, "Training," as it is redundant to the requirements of 10 CFR 50.120, "Training and qualification of nuclear power plant personnel" which became effective on May 26, 1993. 10 CFR 50.120 requires that nuclear power plant licensees establish, implement and maintain a training program derived from a systems approach to training as defined in 10 CFR 55.4, "Definitions." This change is applicable to LGS, OCGS, and TMI Nuclear Station.

On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel, (i.e., Reference 2) which endorsed the training accreditation program developed by the INPO, in association with its National Academy for Nuclear Training (NANT). Subsequently, in References 3 and 4, the NRC indicated it would accept a licensee's licensed operator training program if it is accredited and based on a systems approach to training. This accreditation obviates the need to conform to the guidance of either Reference 5 or 6, which are currently referenced in the applicable station's TS. Reference 4 notes that References 5 and 6 may be superseded by INPO accreditation in accordance with the revised 10 CFR 55, and that licensees may submit a request to the NRC for an administrative change to their TS to revise or delete, as appropriate, the TS requirements which have been superseded. The licensed operator qualifications and training programs will continue to comply with the requirements of 10 CFR 55.

The qualifications and training programs for all other unit staff will continue to meet or exceed the requirements of 10 CFR 50.120 and the ANSI or ANSI/ANS standards currently delineated in the TS.

In addition, the NRC has recently published "NRC Regulatory Issue Summary 2001-01, Eligibility of Operator License Applicants," dated January 18, 2001, "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator (RO) and senior operator (SO) license applicants." This document again acknowledges that 10 CFR 55.31(a)(4), as amended on March 25, 1987, states that, "...the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a system approach to training . . ." Regulatory Issue Summary (RIS) 2001-01 further makes the following statements.

> ". . .a facility licensee's training program would be considered approved by the NRC when it is accredited by the National Nuclear Accrediting Board (NNAB)."
>
> "The fact that every facility licensee has voluntarily obtained and periodically renewed the accreditation of its licensed operator training program suggests that every facility licensee is implementing the education and experience guidelines endorsed by the NNAB. The NRC staff understands that the current version of those guidelines are outlined by the National Academy for Nuclear Training (NANT) in its 'Guidelines for Initial Training and Qualification of Licensed Operators,' (NANT 2000 guidelines) which were issued in January 2000."
>
> ". . .the NANT's guidelines for education and experience (those that were in effect in 1987 or those that were issued in January 2000) outline acceptable methods for implementing the Commission's regulations in this area."
>
> "The staff encourages all facility licensees to review their requirements and commitments related to RO and SO education and experience and to update their documentation (e.g., FSAR, TS, and training program descriptions) to enhance consistency and minimize confusion."

Licensed operator qualifications and training can have an indirect impact on accidents previously evaluated. However, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55 rule, determined that this impact remains acceptable when licensees have an accredited licensed operator training program which is based on a systems approach to training. The NRC has concluded in References 4 and 7 that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. Therefore, maintaining an INPO accredited, systems based licensed operator training program is equivalent to maintaining an NRC approved licensed operator training program which conforms with applicable NRC Regulatory Guides or NRC endorsed industry standards.

The training program for appropriate unit staff personnel other than licensed operators is now addressed by 10 CFR 50.120. With the 10 CFR 50.120 rule, the NRC is emphasizing the need to ensure that industry personnel training programs are based upon job performance requirements. Personnel who are subjected to training based on job performance requirements should be able to perform their jobs more efficiently and with fewer errors. This will be accomplished using the systems approach to training implemented by INPO accredited training programs for selected nuclear personnel. Included within the rule is the requirement that the training program must reflect industry experience. Therefore, due to the existence of 10 CFR 50.120, there is no need to maintain the reference to training of unit staff personnel within TS 6.4.1. In addition, deletion of TS 6.4.1 is consistent with Improved Technical Specifications.

The Exelon and AmerGen licensed operator training programs have been accredited by INPO and are based on a systems approach to training. Further, the non-licensed personnel training programs have also been accredited by INPO.

Since the proposed TS changes are administrative in nature, they do not affect plant design, hardware, system operation, or procedures.

Based on the above discussion, the proposed TS changes are consistent with 10 CFR 55 and 10 CFR 50.120; and do not adversely affect nuclear safety or plant operations.

G. IMPACT ON PREVIOUS SUBMITTALS

We have reviewed the proposed TS changes for potential impact upon previous TS change requests currently under NRC review. No impacts have been identified.

H. SCHEDULE REQUIREMENTS

We request that the NRC review and approve the proposed TS changes by February 1, 2002, to support the continued processing of licensed operator candidates.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

I. REFERENCES

1. Volume 52, Federal Register, Page 9453 (52 FR 9453), dated March 25, 1987

2. "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel," 50 FR 11147, dated March 20, 1985

3. NRC Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Conforming Amendments," dated March 19, 1987

4. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," published November 1987

5. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel"

6. ANSI/ANS 3.1-1978, "Selection, Qualification and Training of Personnel for Nuclear Power Plants"

7. NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001

Attachment B-1

Marked-up Technical Specifications Page
for Proposed Changes

Braidwood Station
Units 1 and 2

Marked-up TS Page

5.3-1

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exception: (S) either the senior health physics supervisor or lead health physicist, shall meet or exceed the qualifications for "Radiation Protection Manager" in Regulatory Guide 1.8, September 1975.

, and the licensed operators shall comply with the requirements of 10 CFR 55

Attachment B-2

Marked-up Technical Specifications Page
for Proposed Changes

Byron Station
Units 1 and 2

Marked-up TS Page

5.3-1

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exception: either the senior health physics supervisor or lead health physicist, shall meet or exceed the qualifications for "Radiation Protection Manager" in Regulatory Guide 1.8, September 1975, and the licensed operators shall comply with the requirements of 10CFR55

Attachment B-3

Marked-up Technical Specifications Page
for Proposed Changes

Clinton Power Station
Unit 1

Marked-up TS Page

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, ~~as modified by Specification 5.2.2.f.~~ with the following exception: the licensed operators shall comply with the requirements of 10CFR55.

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Marked-up Technical Specifications Page
for Proposed Changes

Dresden Nuclear Power Station
Units 2 and 3

Marked-up TS Page

5.3-1

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions:

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, ~~except for~~ the radiation protection manager(X) ~~who~~ shall meet or exceed the qualifications for "Radiation Protection Manager" in Regulatory Guide 1.8, September 1975.

, and the licensed operators shall comply with the requirements of 10CFR55

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Marked-up Technical Specifications Pages
for Proposed Changes

LaSalle County Station
Units 1 and 2

Marked-up Unit 1 TS Page

5.3-1

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions:

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, ~~except~~ the radiation protection manager ~~who~~ shall meet the requirements of "radiation protection manager" in Regulatory Guide 1.8, September 1975. Also, the ANSI N18.1-1971 qualification requirements for "radiation protection technician" may be met by either of the following alternatives:

a. Individuals who have completed the radiation protection technician training program and have accrued one year of working experience in the specialty; or

b. Individuals who have completed the radiation protection technician training program, but have not yet accrued one year of working experience in the specialty, who are supervised by on-shift radiation protection supervision who meet the requirements of ANSI N18.1-1971, Section 4.3.2 or Section 4.4.4.

, and the licensed operators shall comply with the requirements of 10CFR55

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Marked-up Technical Specifications Pages for Proposed Changes

Limerick Generating Station Units 1 and 2

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6.4 ~~TRAINING~~ DELETED.

~~6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.~~

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

Plant Operations
Engineering
Maintenance
Instrumentation and Controls
Planning
Radiation Safety
Chemistry
Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

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6.5 REVIEW AND AUDIT

6.5.1 Plant Operations Review Committee (PORC)

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6.4 ~~TRAINING~~ DELETED

~~6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.~~

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

Plant Operations
Engineering
Maintenance
Instrumentation and Controls
Planning
Radiation Safety
Chemistry
Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

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Oyster Creek Generating Station

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*Issued by NRC Order dated 10-24-80

c. A break of at least eight hours should be allowed between work period, including shift turnover time.

d. In a, b, and c above, the time required to complete shift turnover is to be counted as break time and is not to be counted as work time.

e. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Department Managers, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

j. The Senior Manager - Operations and the Shift Manager require Senior Reactor Operators licenses. The licensed Nuclear Plant Operators require a Reactor Operators license.

6.2.2.3 Individuals who train the operating staff and those who carry out the health physics and quality assurance function shall have sufficient organizational freedom to be independent of operational pressures, however, they may report to the appropriate manager on site.

6.3 Facility Staff Qualifications

with the following exception: the licensed operators shall comply with the requirements of 10CFR55

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. ~~Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.~~ Technicians and maintenance personnel who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are permitted to perform work for which qualification has been demonstrated.

6.3.2 The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 (Rev. 1-R, 9/75). Each other member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations and shall have been certified by the management position responsible for radiological controls as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.

6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, response and analysis of the plant for transients and accidents.

6.4 ~~TRAINING~~ Deleted.

~~6.4.1 A retraining program for operators shall be maintained under the direction of the Manager responsible for plant training and shall meet the requirements and recommendation of 10 CFR Part 55. Replacement training programs, the content of which shall meet the requirements of 10 CFR Part 55, shall be conducted under the direction of the Manager responsible for plant training for licensed operators and Senior Reactor Operators.~~

6.5 REVIEW AND AUDIT

6.5.1 TECHNICAL REVIEW AND CONTROL

The director of each department shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in 6.5.1.1 through 6.5.1.5 within his functional area of responsibility as assigned in the Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.

ACTIVITIES

6.5.1.1 Each procedure required by Technical Specification 6.8 and other procedures which affect nuclear safety, and substantive changes thereto, shall be prepared by a designated individual(s)/group knowledgeable in the area affected by the procedure. Each such procedure, and substantive change thereto, shall be reviewed for adequacy by an individual(s)/group other than the preparer, but who may be from the same division as the individual who prepared the procedure or change.

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Marked-up Technical Specifications Pages for Proposed Changes

Peach Bottom Atomic Power Station Units 2 and 3

Marked-up Unit 2 TS Page

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Marked-up Unit 3 TS Page

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions:

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions described in the UFSAR, ~~except for~~ the Manager-Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

, and the licensed operators shall comply with the requirements of 10CFR55

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions:

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions described in the UFSAR, ~~except for~~ the Manager-Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

, and the licensed operators shall comply with the requirements of 10CFR55

Attachment B-9

Marked-up Technical Specifications Page
for Proposed Changes

Three Mile Island Nuclear Station
Unit 1

Marked-up TS Page

6.3

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6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall ~~also meet~~ the requirements of 10 CFR Part 55. Individuals who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are not considered technicians or maintenance personnel for purposes of determining qualifications but are permitted to perform work for which qualification has been demonstrated.

6.3.2 The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each radiological controls technician/supervisor shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2/4.3.2, or be formally qualified through an NRC approved TMI-1 Radiation Controls training program. All radiological controls technicians will be qualified through training and examination in each area or specific task related to their radiological controls functions prior to their performance of those tasks.

6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in unit design, response and analysis of transients and accidents.

6.4 TRAINING

~~6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the plant training manager and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977. Licensed operator training shall also meet the requirements of 10 CFR Part 55.~~

6.4.2 A training program for the Fire Brigade shall be maintained and shall meet or exceed the requirements of Section 600 of the NFPA Code.

6.5 REVIEW AND AUDIT

6.5.1 TECHNICAL REVIEW AND CONTROL

The director of each department shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in 6.5.1.1 through 6.5.1.5 within his functional area of responsibility as assigned in the Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.

Attachment B-10

Marked-up Technical Specifications Page
for Proposed Changes

Quad Cities Nuclear Power Station
Units 1 and 2

Marked-up TS Page

5.3-1

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions:

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, ~~except for~~ the radiation protection manager or lead radiation protection technician, ~~who~~ shall meet or exceed the qualifications for "Radiation Protection Manager" in Regulatory Guide 1.8, September 1975.

; and the licensed operators shall comply with the requirements of 10CFR55

Attachment C

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

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:

> Involve a significant increase in the probability or consequences of an accident previously evaluated; or
>
> Create the possibility of a new or different kind of accident from any accident previously evaluated; or
>
> Involve a significant reduction in a margin of safety.

In support of this determination, an evaluation of each of the three criteria set forth in 10 CFR 50.92 is provided below regarding the proposed license amendment.

Overview

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) are requesting changes to Appendix A, Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, NPF-62, DPR-19, DPR-25, NPF-11, NPF-18, NPF-39, NPF-85, DPR-16, DPR-44, DPR-56, DPR-50, DPR-29, and DPR-30, for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Clinton Power Station (CPS), Unit 1, Dresden Nuclear Power Station (DNPS), Units 2 and 3, LaSalle County Station (LSCS), Units 1 and 2, Limerick Generating Station (LGS), Units 1 and 2, Oyster Creek Generating Station (OCGS), Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Three Mile Island (TMI) Nuclear Station, Unit 1, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively.

The proposed changes address the following two issues.

1. Revise and clarify the current TS requirements for "Facility Staff Qualifications" for licensed operator qualifications and training that have been superseded based on licensed operator training programs being accredited by the Institute for Nuclear Power Operations (INPO) and the implementation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987. 10 CFR 55 requires that a license applicant "has successfully completed a Commission-approved training program that is based on a systems approach to training . . ." This proposed change is applicable to Byron Station, Braidwood Station, CPS, DNPS, LSCS, OCGS, PBAPS, TMI Nuclear Station, and QCNPS.

2. Delete Section 6.4, "Training," as it is redundant to the requirements of 10 CFR 50.120, "Training and qualification of nuclear power plant personnel" which became effective on May 26, 1993. 10 CFR 50.120 requires that nuclear power plant licensees establish, implement and maintain a training program derived from a systems approach to training as defined in 10 CFR 55.4, "Definitions." This change is applicable to LGS, OCGS, and TMI Nuclear Station.

Attachment C

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

The proposed Technical Specification (TS) changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes are administrative changes to clarify the current requirements for licensed operator qualifications and licensed operator and non-licensed personnel training programs. These changes conform to the current requirements of 10 CFR 55 and 10 CFR 50.120.

Although licensed operator qualifications and training may have an indirect impact on accidents previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55 rule, concluded that this impact remains acceptable as long as licensed operator training programs are certified to be accredited and are based on a systems approach to training. Exelon's and AmerGen's licensed operator training programs have been accredited by the INPO and are based on a systems approach to training. The proposed TS changes take credit for the INPO accreditation of the licensed operator training programs and require continued compliance with the requirements of 10 CFR 55. The TS requirements for all other unit staff qualifications remain unchanged.

The training program for appropriate unit staff personnel other than licensed operators is now addressed by 10 CFR 50.120. With the 10 CFR 50.120 rule, the NRC is emphasizing the need to ensure that industry personnel training programs are based upon job performance requirements. Personnel who are subjected to training based on job performance requirements should be able to perform their jobs more efficiently and with fewer errors. This will be accomplished using the systems approach to training implemented by INPO accredited training programs for selected nuclear personnel. Included within the rule is the requirement that the training program must reflect industry experience.

Based on the above discussion, the proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes are administrative changes to clarify the current requirements for licensed operator qualifications and licensed operator and non-licensed personnel training programs and to conform to the revised 10 CFR 55 and 10 CFR 50.120.

As noted above, although licensed operator qualifications and training may have an indirect impact on the possibility of a new or different kind of accident from any accident previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised rule, concluded that this impact remains acceptable as long as licensed operator training programs are certified to be accredited and based on a systems approach to training. As previously noted, Exelon's and AmerGen's licensed operator training programs have been accredited by INPO and are based on a systems approach to training. The proposed TS changes take credit for the INPO

accreditation of the licensed operator training programs and require continued compliance with the requirements of 10 CFR 55. The TS requirements for all other unit staff qualifications remain unchanged.

As previously noted, the training programs for appropriate unit staff personnel other than licensed operators are now addressed by 10 CFR 50.120. With the 10 CFR 50.120 rule, the NRC is emphasizing the need to ensure that industry personnel training programs are based upon job performance requirements. Personnel who are subjected to training based on job performance requirements should be able to perform their jobs more efficiently and with fewer errors. This will be accomplished using the systems approach to training implemented by INPO accredited training programs for selected nuclear personnel. Included within the rule is the requirement that the training program must reflect industry experience.

Additionally, the proposed TS changes do not affect plant design, hardware, system operation, or procedures; therefore, based on the above discussion, the proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes do not involve a significant reduction in a margin of safety.

The proposed TS changes are administrative changes to clarify the current requirements applicable to licensed operator qualifications and licensed operator and non-licensed personnel training programs. These changes are consistent with the requirements of 10 CFR 55 and 10 CFR 50.120. The TS qualification requirements for all other unit staff remain unchanged.

Licensed operator qualifications and training can have an indirect impact on a margin of safety. However, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55, determined that this impact remains acceptable when licensees maintain licensed operator training programs that are accredited and based on a systems approach to training. As noted previously, Exelon's and AmerGen's licensed operator training programs have been accredited by INPO and are based on a systems approach to training.

The NRC has concluded, as stated in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining INPO accredited, systems approach based licensed operator training programs is equivalent to maintaining NRC approved licensed operator training programs which conform with applicable NRC Regulatory Guides or NRC endorsed industry standards. The margin of safety is maintained by virtue of maintaining INPO accredited licensed operator training programs and through continued compliance with the requirements of 10 CFR 55.

In addition, the NRC has recently published "NRC Regulatory Issue Summary 2001-01, Eligibility of Operator License Applicants," dated January 18, 2001, "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator (RO) and senior operator (SO) license applicants." This document again acknowledges that the INPO National Academy for Nuclear Training (NANT) guidelines for education and experience, outline acceptable methods for implementing the NRC's regulations in this area.

Based on the above discussion, the proposed TS changes do not involve a significant reduction in a margin of safety.

Conclusion

Based upon the above evaluation, we have concluded that the three criteria of 10 CFR 50.92(c) are satisfied and that the proposed changes to the TS involve no significant hazards consideration.

Attachment D

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

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) are requesting changes to Appendix A, Technical Specifications (TS) of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, NPF-62, DPR-19, DPR-25, NPF-11, NPF-18, NPF-39, NPF-85, DPR-16, DPR-44, DPR-56, DPR-50, DPR-29, and DPR-30, for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Clinton Power Station (CPS), Unit 1, Dresden Nuclear Power Station (DNPS), Units 2 and 3, LaSalle County Station (LSCS), Units 1 and 2, Limerick Generating Station (LGS), Units 1 and 2, Oyster Creek Generating Station (OCGS), Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Three Mile Island (TMI) Nuclear Station, Unit 1, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively.

The proposed changes will revise, clarify or delete, as appropriate, requirements regarding Facility Staff Qualifications and licensed operator and non-licensed personnel training programs. The requested changes will revise requirements that have been superseded based on licensed operator training programs being accredited by the Institute for Nuclear Power Operations, promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987, and adoption of a systems approach to training as required by 10 CFR 50.120, "Training and qualification of nuclear power plant personnel."

Exelon and AmerGen have evaluated the proposed TS change request consistent with 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." Exelon and AmerGen have determined that this proposed TS change request meets the criteria for a categorical exclusion set forth in paragraph (c)(10) of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review." This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," and it changes recordkeeping, reporting, or administrative procedures or requirements. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the proposed amendment.