

Docket Nos.: STN 50-454
and STN 50-455

OCT 1 1985

Mr. Dennis L. Farrar
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Farrar:

Subject: Amendment to Byron Technical Specifications - Access to High
Radiation Areas

The Commission has issued the enclosed amendment No. 1 to Facility Operating License NPF-37 for Byron Station, Unit 1. This amendment also applies to the Technical Specifications for Byron Station, Unit 2, although Unit 2 does not have an operating license. Byron Station, Units 1 and 2, have common Technical Specifications (NUREG-1113). This amendment is in response to your application dated June 26, 1985.

The amendment approves changes to Technical Specifications relating to administrative controls for access to high radiation areas during certain emergency situations.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the FEDERAL REGISTER on July 31, 1985 (50 FR 31067). The State of Illinois Department of Nuclear Safety, by letter dated July 15, 1985, stated that no adverse finding exists as a result of their review of the proposed amendment. By letters dated August 14, 1985 and August 27, 1985, Mr. Stanley Campbell, Secretary for the Sinnissippi Alliance for the Environment (SAFE), opposed the amendment. The enclosed Safety Evaluation discusses Mr. Campbell's comments. No requests for hearing were received.

This amendment also corrects an error made in the printing of the Technical Specifications. Page 3/4 6-2, instead of page 6-2, was inadvertently printed in Section 6.0, Administrative Controls.

A copy of our related Safety Evaluation is also enclosed. This action will appear in the Commission's bi-weekly notice publication in the FEDERAL REGISTER.

Sincerely,

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PDR ADDCK 05000454
P PDR

for Paul W. O'Connor
B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosures: As stated

cc: See next page

LB#1/DL
LOlshan/mac
9/30/85

LB#1/DL
MRusbrook
10/1/85

LB#1/DL
for BJYoungblood
9/30/85

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C(2) of Facility Operating License No. NPF-37 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 1, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

for Paul W. O'Connor
B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: OCT 1 1985

LB#1/DL
LO1shan/mac
9/9/85

LB#1/DL
MRushbrook
9/11/85

LB#1/DL
BJYoungblood
9/11/85



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 1 1985

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Paul W. Connor

for B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosures: As stated

cc: See next page

Mr. Dennis L. Farrar
Commonwealth Edison Company

Byron Station
Units 1 and 2

OCT 1 1985

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DISTRIBUTION:

BYRON STATION, UNIT 1 AMENDMENT NO. 1

DATED: OCT 01 1985

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

COMMONWEALTH EDISON COMPANY

DOCKET NO. STN 50-454

BYRON STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 1
License No. NPF-37

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Commonwealth Edison Company (the licensee) dated June 26, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission.
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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P PDR

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C(2) of Facility Operating License No. NPF-37 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 1, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Paul W. Connor

for B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 1, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 1

FACILITY OPERATING LICENSE NO. NPF-37

DOCKET NO. STN 50-454

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

REMOVE

6-24
3/4 6-2 (From Section 6.0)

INSERT

6-24
6-2

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physics personnel, equipment operators, and key maintenance personnel.

The amount of overtime worked by Unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.2.3 ONSITE NUCLEAR SAFETY GROUP (ONSG)

FUNCTION

6.2.3.1 The ONSG serves as an independent safety engineering group and shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The ONSG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Manager of Nuclear Safety, and the Superintendent, Byron Station.

COMPOSITION

6.2.3.2 The ONSG shall be composed of at least four, dedicated, full-time engineers located on site.

RESPONSIBILITIES

6.2.3.3 The ONSG shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ONSG shall be prepared, maintained, and forwarded each calendar month to the Manager of Nuclear Safety, and the Superintendent, Byron Station.

6.2.4 SHIFT TECHNICAL ADVISOR

The Station Control Room Engineer (SCRE) may serve as the Shift Technical Advisor (STA) during abnormal operating or accident conditions. During these conditions the SCRE or other on duty STA shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

*Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Rad/Chem Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the Radiation Work Permit.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area. During emergency situations which involve personnel injury or actions taken to prevent major equipment damage, continuous surveillance and radiation monitoring of the work area by a qualified individual may be substituted for the routine RWP procedure.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded (by a more substantial obstacle than rope), conspicuously posted, and a flashing light shall be activated as a warning device.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 1 TO FACILITY OPERATING LICENSE NO. NPF-37

COMMONWEALTH EDISON COMPANY

BYRON STATION, UNIT NO. 1

DOCKET NO. STN 50-454

1.0 INTRODUCTION

By application dated June 26, 1985, Commonwealth Edison Company (the licensee) requested an amendment to the Technical Specifications for Byron Station, Units 1 and 2. The proposed Technical Specification change relates to the control of access to high radiation areas.

2.0 DISCUSSION AND EVALUATION

Section 203.C.(2) of the Code of Federal Regulations Title 10, Part 20 provides for control of personnel access to high radiation areas. To assist licensees of nuclear power reactors in meeting the requirements of 10 CFR 203.C.(2) the NRC has established specifications for the control of access to high radiation areas in Section 6.12 of the Standard Technical Specifications (STS) NUREG-0452 Rev. 4. Byron Station, Units 1 and 2, has basically incorporated the Standard Technical Specifications.

The STS require in part that, prior to entering an area with radiation levels greater than 1000 mR/hr, the dose rates levels for the area be specified on an approved radiation work permit (RWP) without exception. The licensee's proposed change would allow for continuous surveillance and radiation monitoring of the work area by qualified individuals in lieu of specifying the dose rate on an approved RWP during an emergency involving personnel injury or actions taken to prevent major equipment

damage. It is the staff's position that the proposed technical specification change for an emergency situation is sufficient to provide positive control over access to high radiation areas as required in 10 CFR Part 20.203.C.(2), and is acceptable to the staff.

By letters dated August 14, 1985 and August 27, 1985, Mr. Stanley Campbell, Secretary for the Sinnissippi Alliance for the Environment (SAFE), opposed the amendment. Mr. Campbell opposes the amendment because SAFE "cannot condone the slackening of the rules for worker protection just to save pieces of machinery." In response to Mr. Campbell's concerns, we note that the occupational dose requirements of 10 CFR Part 20 are not being reduced by this amendment. Instead, this amendment changes only the means for providing positive control for access to high radiation areas, and only during certain emergencies. Therefore, as previously mentioned, we find this amendment acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment allows personnel to enter high radiation areas during certain emergencies without an approved Radiation Work Permit. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that:
(1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ACKNOWLEDGEMENT

M. Lamastra and L. Olshan prepared this Safety Evaluation.

Dated: October 1, 1985