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RS-02-100

June 19, 2002

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

ADD
M003

Subject: Revision to Technical Specifications Change Request – Clarification of Requirements for Licensed Operator Qualifications and Training

Reference: Letter from K. A. Ainger (Exelon Generation Company, LLC) to NRC, "Request for Technical Specifications Changes to Clarify Requirements for Licensed Operator Qualifications and Training," dated August 1, 2001

In the referenced letter, Exelon Generation Company (Exelon), LLC and AmerGen Energy Company (AmerGen), LLC, in accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," requested a change to Appendix A, Technical Specifications (TS) of the above noted Facility Operating Licenses.

The proposed changes would revise, clarify or delete, as appropriate, requirements regarding Facility Staff Qualifications and licensed operator and non-licensed personnel training programs. These changes would revise requirements that have been superseded based on licensed operator training programs being accredited by the Institute for Nuclear Power Operations, promulgation of the revised 10 CFR 55, "Operators'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."

TS Section 5.3, "Facility [Unit] Staff Qualifications," or TS Section 6.3, Facility Staff Qualifications," as applicable to each respective station, describes the requirements for the facility/unit staff qualifications. The original requested change proposed to revise the existing qualification requirements to add an exception for licensed operators that states:

"...licensed operators shall comply with the requirements of 10 CFR 55."

After review of this proposed change, the NRC requested that this exception be revised to add more specificity to the license operator qualification requirements. Therefore, we are proposing to revise the licensed operator qualification exception to state the following:

"...the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

Attachment A, "Description and Safety Analysis for Proposed Changes," to this letter provides a discussion regarding the revision to the proposed changes to TS Section 5.3 or TS Section 6.3, as applicable. Attachments B-1 through B-10 present the revised marked-up TS page for each respective station. Please note that the original proposed changes for Limerick Generating Station are not affected by this revision.

This proposed revision does not affect the supporting analysis for the original license amendment request as described in the referenced letter. No other information submitted with the referenced letter is affected by this change including Attachment A, "Description and Safety Analysis for Proposed Changes," Attachment C, "Information Supporting a Finding of

No Significant Hazards Consideration," and Attachment D, "Information Supporting an Environmental Assessment."

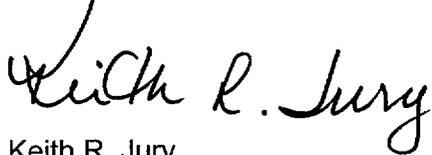
We request that the NRC review and approve the proposed TS changes by September 1, 2002, to support the continued processing of licensed operator candidates.

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 Exelon and AmerGen Quality Assurance Programs.

We are notifying the States of Illinois, New Jersey and Pennsylvania of this proposed change to the TS by sending 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,



Keith R. Jury
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

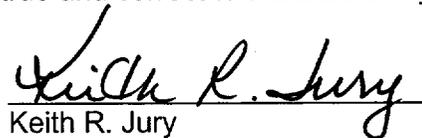
THREE MILE ISLAND NUCLEAR STATION -
UNIT 1)

50-289

**SUBJECT: Revision to Technical Specifications Change Request – Clarification
of 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.

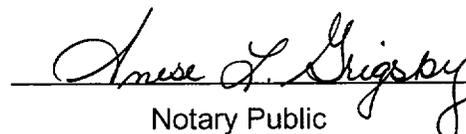


Keith R. Jury
Director – Licensing
Mid-West Regional Operating Group

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

for the State above named, this 19th day of

June, 2002.


Notary Public



Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

A. SUMMARY OF PROPOSED SUPPLEMENTAL CHANGES

In a letter from K. A. Ainger (Exelon Generation Company, LLC) to NRC, "Request for Technical Specifications Changes to Clarify Requirements for Licensed Operator Qualifications and Training," dated August 1, 2001, Exelon Generation Company (Exelon), LLC and AmerGen Energy Company (AmerGen), LLC, in accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," requested 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 would revise, clarify or delete, as appropriate, requirements regarding Facility Staff Qualifications and licensed operator and non-licensed personnel training programs. These changes would 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."

TS Section 5.3, "Facility [Unit] Staff Qualifications," or TS Section 6.3, Facility Staff Qualifications," as applicable to each respective station, describes the requirements for the facility/unit staff qualifications. The original requested change proposed to revise the existing qualification requirements to add an exception for licensed operators that states:

"licensed operators shall comply with the requirements of 10 CFR 55."

After review of this proposed change, the NRC requested that this exception be revised to add more specificity to the license operator qualification requirements. Therefore, we are proposing to revise the licensed operator qualification exception to state the following:

"...the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

A complete description of the proposed changes is given in Section 3.0, "Description of the Proposed Changes," of this Attachment. Attachments B-1 through B-10 provide the marked-up TS pages indicating the proposed supplemental changes for each respective station.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

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

The original proposed changes for LGS are not affected by this revision.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

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. . . "

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. . . "

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. DESCRIPTION OF THE PROPOSED CHANGES

The following section describes the revision to 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 the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, in lieu of ANSI N18.1-1971.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

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: 1) 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 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

2. Byron Station

TS Section 5.3, "Facility Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, 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: 1) 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 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

3. Clinton Power Station

TS Section 5.3, "Facility Unit Qualifications," Specification 5.3.1 will be revised to add an exception that requires the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, 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 education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

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 the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, in lieu of ANSI N18.1-1971

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

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: 1) the radiation protection manager shall meet or exceed the qualifications for 'Radiation Protection Manager' in Regulatory Guide 1.8, September 1975, and 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

5. LaSalle County Station

TS Section 5.3, "Unit Staff Qualifications," Specification 5.3.1 will be revised to add an exception that requires the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, 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: 1) the radiation protection manager shall meet the requirements of 'radiation protection manager' in Regulatory Guide 1.8, September 1975, and 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

6. Limerick Generating Station

The original proposed changes for LGS are not affected by this revision.

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 the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, 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 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 exceptions: 1) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure, and 2) 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."

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

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 the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, 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: 1) the Manager-Radiation Protection shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

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 the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, in lieu of, not in addition to, ANSI/ANS 3.1-1978.

Specification 6.3.1 will be revised to state:

"Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications, with the following exceptions: 1) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure, and 2) individuals who do not meet ANSI/ANS 3.1-1978, 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."

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 the education and experience eligibility requirements for operator license applicants, and changes thereto, be approved by the NRC and described in an applicable station training procedure, in lieu of ANSI N18.1-1971.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

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: 1) 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 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

D. SAFETY ANALYSES OF THE PROPOSED SUPPLEMENTAL CHANGES

The justification and conclusions reached in the safety analyses of the original license amendment request, dated August 1, 2001, remain valid and are not affected by this revision to the proposed change. In addition to the discussion in the original safety analyses, the education and experience eligibility requirements for reactor operator and senior reactor operator license applicants will be described in applicable station training procedures. These eligibility requirements will also be the experience requirements for license holders. Excerpts from these procedures, specifying the eligibility/experience requirements, are presented below. These requirements are consistent with the current NRC endorsed industry licensed operator training program education and experience eligibility requirements. The content of these procedures, as presented below, will not be changed or deleted without prior NRC approval. Changes to the applicable procedures, addressing issues other than the content of eligibility requirements, may be made consistent with the Exelon procedure revision process. A NOTE will be added to the applicable procedures to state that the content of the applicable sections/pages may not be changed without prior NRC approval.

The eligibility flow charts use a number of terms that require further definition for clarification purposes. These definitions are provided below.

Six Months on Site

The six months on site time requirement may be fulfilled by working in a technical capacity in any station department including the Training Department as an instructor, supervisor or manager. Time on site credited toward meeting overall experience requirements may concurrently be credited for the six months on site time requirement. Time spent as a student in a training program may not be credited toward the six month on site time period.

Power Plant Experience

Power plant experience is applicable work performed in a civilian or military fossil-fueled or nuclear-fueled electric power production plant during preoperational, startup testing, or operational activities. Experience in petrochemical, similar process plants, or steam propulsion plant design, construction, technical support, operation, maintenance, or training instruction may be substituted for power plant experience. Observation of others performing work is not experience.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

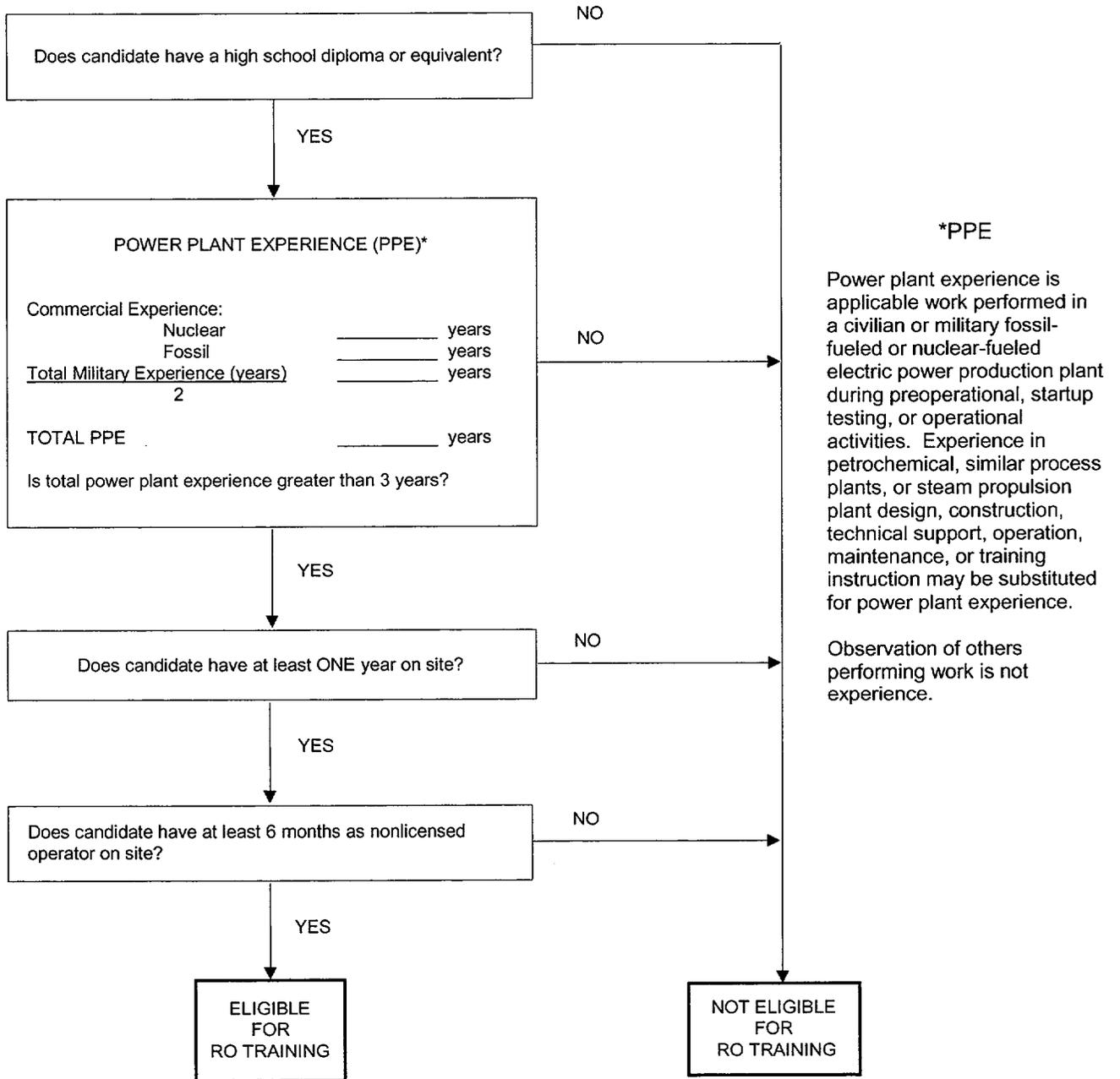
Academic Equivalence

Academic training may be considered equivalent to "Responsible Nuclear Plant Experience" on a one-for-one basis up to a maximum of two years for the "Degreed Plant Staff Engineer Direct SRO." This training must be comprised of successfully completed college-level course work leading to a recognized degree in engineering, engineering technology, or the physical sciences.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

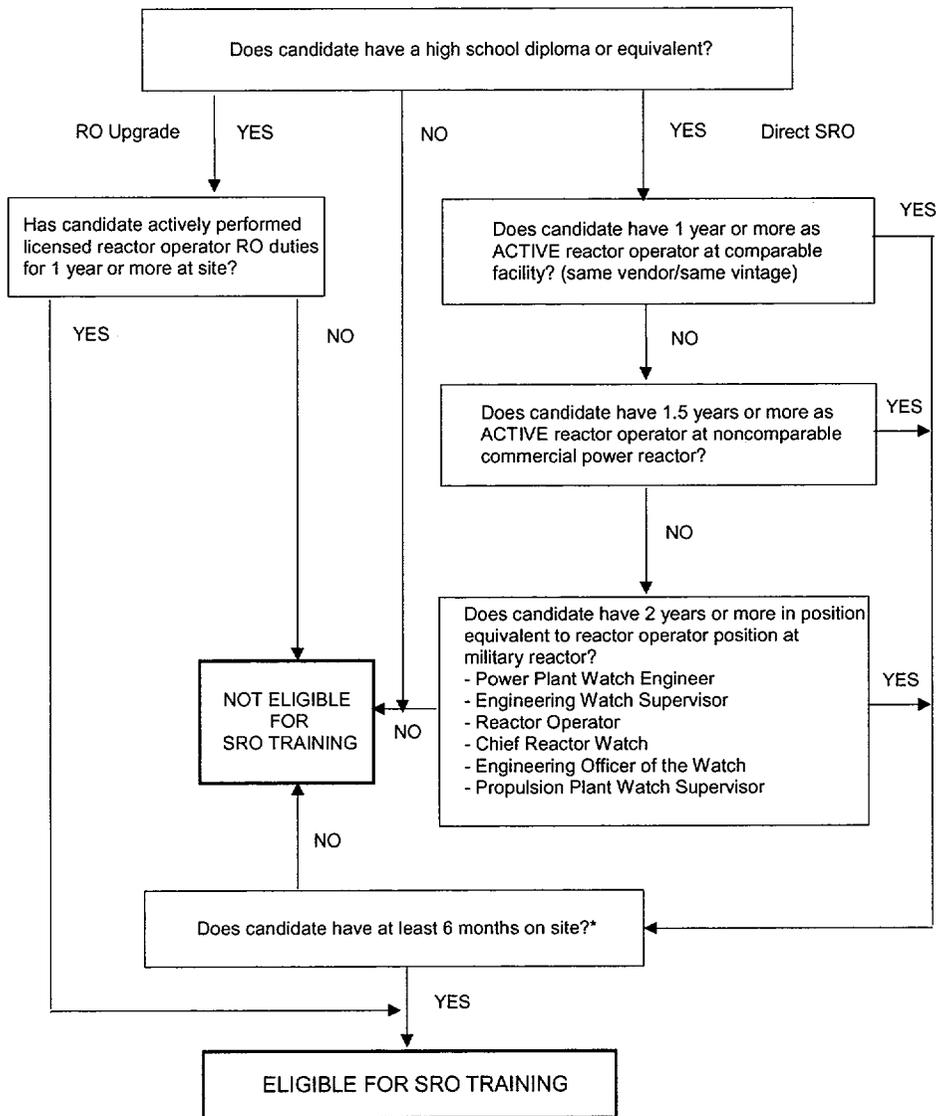
Reactor Operator (RO) Eligibility



Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

Senior Reactor Operator (SRO) Eligibility Reactor Operator (RO) Upgrade or Direct SRO Licensed Reactor Operator or Military Equivalent



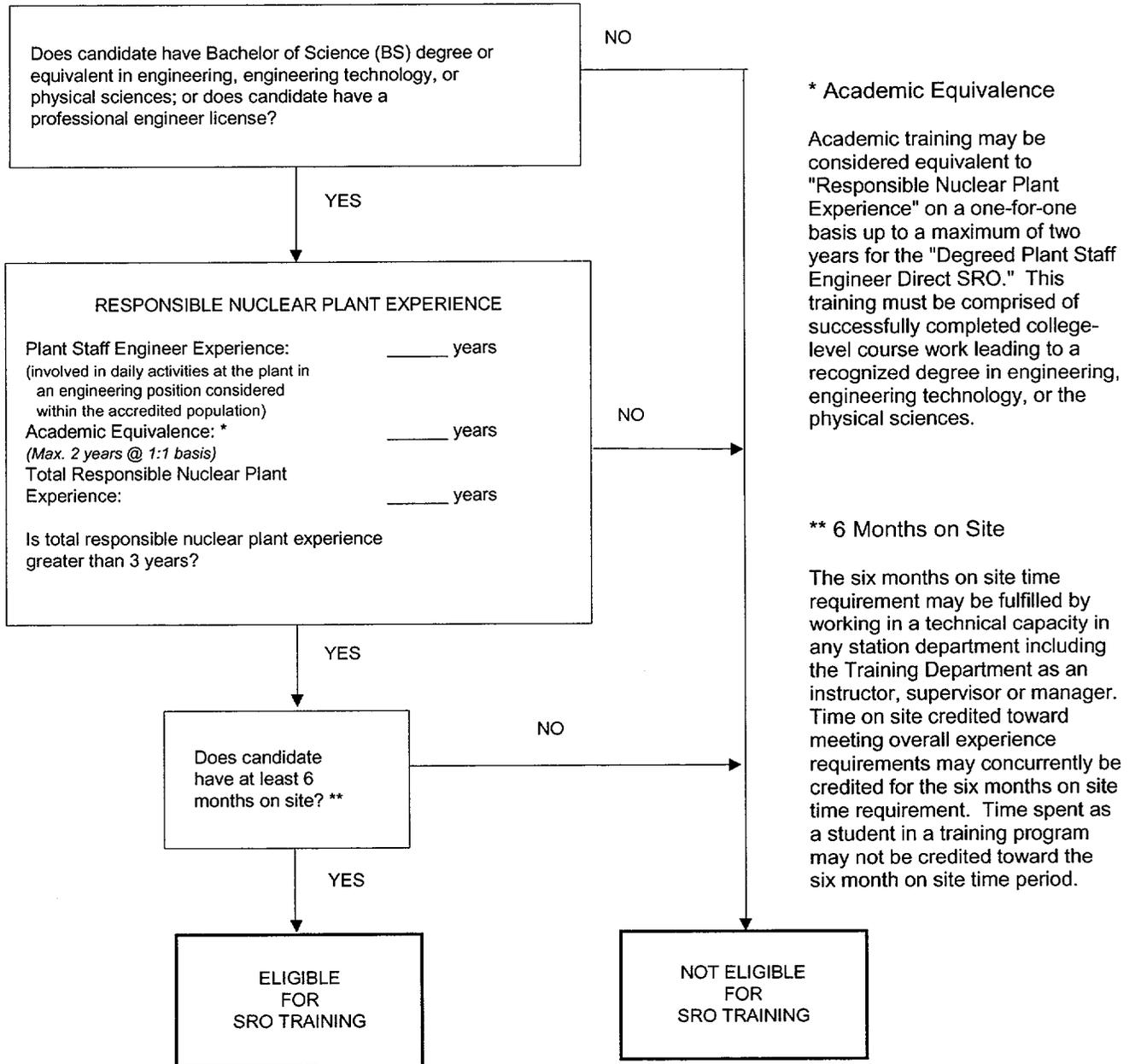
* 6 Months on Site

The six months on site time requirement may be fulfilled by working in a technical capacity in any station department including the Training Department as an instructor, supervisor or manager. Time on site credited toward meeting overall experience requirements may concurrently be credited for the six months on site time requirement. Time spent as a student in a training program may not be credited toward the six month on site time period.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

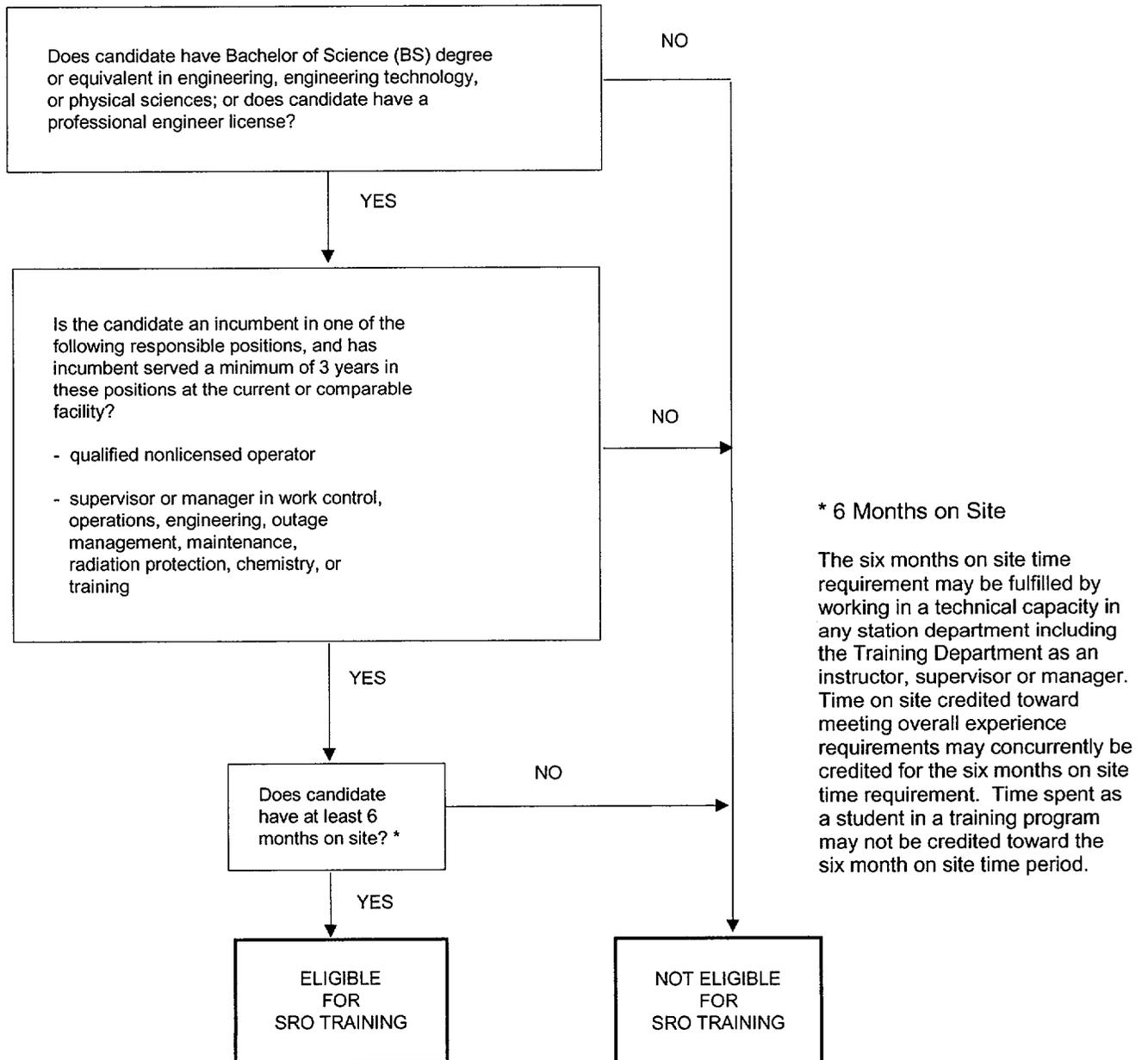
Senior Reactor Operator (SRO) Eligibility
Direct SRO
Degreed Plant Staff Engineer



Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

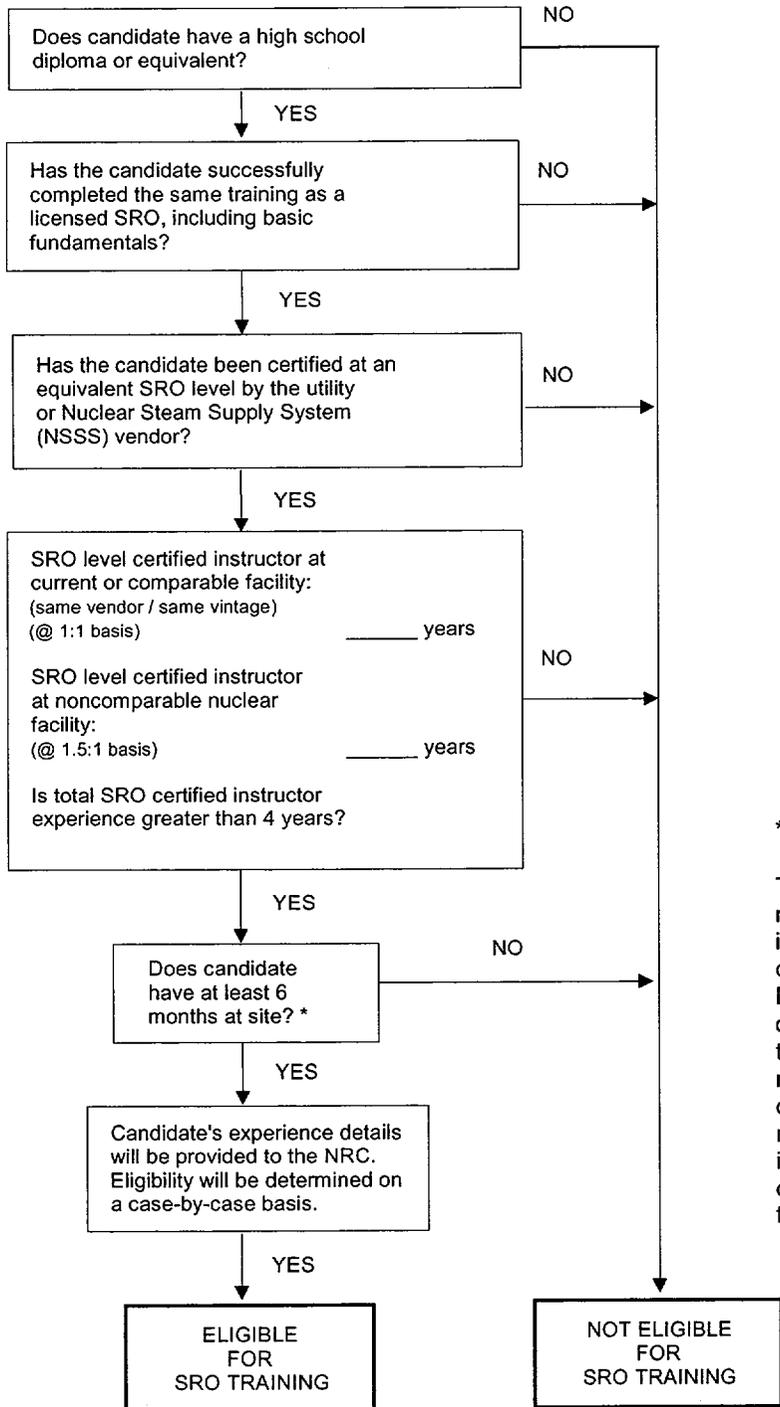
Senior Reactor Operator (SRO) Eligibility
Direct SRO
Degreed Managers or Degreed Nonlicensed Operators



Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

Senior Reactor Operator (SRO) Eligibility
Direct SRO
SRO-Certified Instructor



* 6 Months on Site

The six months on site time requirement may be fulfilled by working in a technical capacity in any station department including the Training Department as an instructor, supervisor or manager. Time on site credited toward meeting overall experience requirements may concurrently be credited for the six months on site time requirement. Time spent as a student in a training program may not be credited toward the six month on site time period.

Attachment A

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

SCHEDULE REQUIREMENTS

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

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: 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

1)

5

2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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

1)

5

2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

Attachment B-3

**Marked-up Technical Specifications Page
for Proposed Changes**

**Clinton Power Station
Unit 1**

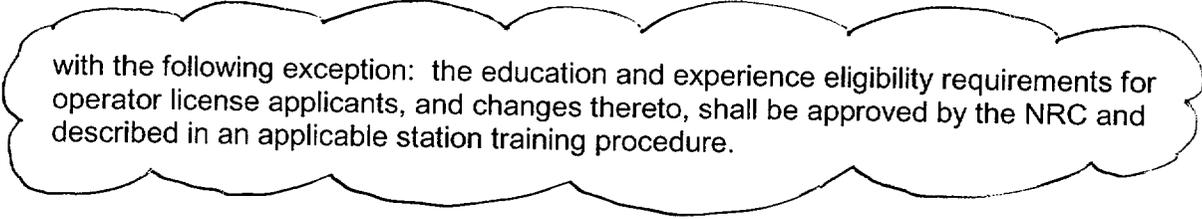
Marked-up TS Page

5.0-5

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 education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

Attachment B-4

**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: 1)

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 ~~who~~ shall meet or exceed the qualifications for "Radiation Protection Manager" in Regulatory Guide 1.8, September 1975, *and*

2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

Attachment B-5

**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: 1)

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 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

Attachment B-6

**Marked-up Technical Specifications Pages
for Proposed Changes**

**Limerick Generating Station
Units 1 and 2**

Marked-up Unit 1 TS Page

See Original Proposed Changes

Marked-up Unit 2 TS Page

See Original Proposed Changes

Attachment B-7

**Marked-up Technical Specifications Pages
for Proposed Changes**

Oyster Creek Generating Station

Marked-up TS Pages

6-2a

- 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 or an Operations Manager, 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

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.

with the following exceptions: 1) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure, and 2)

Attachment B-8

**Marked-up Technical Specifications Pages
for Proposed Changes**

**Peach Bottom Atomic Power Station
Units 2 and 3**

Marked-up Unit 2 TS Page

5.0-5

Marked-up Unit 3 TS Page

5.0-5

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions: 1)

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, ←

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

and 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

with the following exceptions: 1)

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,

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

and 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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-I 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.~~

① 6.4.1 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.

with the following exceptions: 1) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure, and 2)

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: 1)

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 2) the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.