June 27, 1990 🥌

Docket Nos. STN 50-456 and STN 50-457

Mr. Thomas J. Kovach Nuclear Licensing Manager Commonwealth Edison Company-Suite 300 **OPUS West III** 1400 OPUS Place Downers Grove, Illinois 60515

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Dear Mr. Kovach:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NOS. 75269 AND 75270)

The Commission has issued the enclosed Amendment No. 24 to Facility Operating License No. NPF-72 and Amendment No.24 to Facility Operating License No. NPF-77 for the Braidwood Station, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications in response to your application transmitted by letter dated August 14, 1989 and supplemented by letter dated March 19, 1990.

These amendments approve changes to the Technical Specifications to reduce the number of members of the Onsite Nuclear Safety Group from four members to three members.

A copy of the NRC staff's related Safety Evaluation is enclosed. A notice of issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/s/

Stephen P. Sands, Project Manager Project Directorate III-2 Division of Reactor Projects - III, IV. V and Special Projects Office of Nuclear Reactor Regulation

Enclosures:

PDR

- 1. Amendment No. 24 to NPF-72
- Amendment No. 24 to NPF-77 2.
- 3. Safety Evaluation

cc w/enclosures: See next page

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UNITED STATES

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- 2. Amendment No. 24 to NPF-77
- 3. Safety Evaluation

cc: w/enclosures
See next page

Mr. Thomas J. Kovach Commonwealth Edison Company

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

COMMONWEALTH EDISON COMPANY

DOCKET NO. STN 50-456

BRAIDWOOD STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 24 License No. NPF-72

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Commonwealth Edison Company (the licensee) dated August 14, 1989, supplemented March 19, 1990 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.
- 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-72 is hereby amended to read as follows:

9007020200 900627 PDR ADOCK 05000456 PDC (2) Technical Specifications

The Technical Specifications contained in Appendix A as revised through Amendment No. 24 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

Richard J. Barrett, Director Project Directorate III-2 Division of Reactor Projects - III, IV, V and Special Projects Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: June 27, 1990



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. STN 50-457

BRAIDWOOD STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 24 License No. NPF-77

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Commonwealth Edison Company (the licensee) dated August 14, 1989, supplemented March 19, 1990 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 1;
 - 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.
- 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-77 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A as revised through Amendment No. 24 and the Environmental Protection Plan contained in Appendix B, both of which were attached to License No. NPF-72, dated July 2, 1987, 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 if its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Richard J. Barrett, Director Project Directorate III-2 Division of Reactor Projects - III, IV, V and Special Projects Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: June 27, 1990

ATTACHMENT TO LICENSE AMENDMENT NOS. 24 AND 24

FACILITY OPERATING LICENSE NOS. NPF-72 AND NPF-77

DOCKET NOS. STN 50-456 AND STN 50-457

Replace the following page of the Appendix "A" Technical Specifications with the attached page. The revised page is identified by amendment number and contains vertical lines indicating the area of change.

Remove Pages

Insert Pages

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6-2

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6-2

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;
- c. A Radiation Protection Technician,* qualified in radiation protection procedures, shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. 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);

f. The Assistant Superintendent Operating shall hold a Senior Reactor Operator License.

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 Safety Assessment Manager, and the Station Manager, Braidwood Station.

COMPOSITION

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

^{*}The Radiation Protection Technician may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.





SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 24 TO FACILITY OPERATING LICENSE NO. NPF-72

AND AMENDMENT NO. 24 TO FACILITY OPERATING LICENSE NO. NPF-77

COMMONWEALTH EDISON COMPANY

BRAIDWOOD STATION, UNIT NOS. 1 AND 2

DOCKET NOS. STN 50-456 AND STN 50-457

1.0 INTRODUCTION

By letter dated August 14, 1989, and supplemented by letter dated March 19, 1990, Commonwealth Edison Company (CECo), the licensee, submitted proposed amendments to Facility Operating Licenses NPF-72 and NPF-77, for Braidwood Station, Units 1 and 2. The proposed amendments request a change to Technical Specification (TS) 6.2.3.2 to reduce the number of members of the Onsite Nuclear Safety Group (ONSG) from four members to three members.

2.0 DISCUSSION

The ONSG performs the functions defined in NUREG-0737, Item I.B.1.2 -Independent Safety Engineering Group (ISEG). This item was developed by the NRC staff as part of the Action Plan which was issued after the accident at Three Mile Island, Unit 2, to improve safety at power reactors. As stated in NUREG-0737, Item I.B.1.2:

"The principal function of the ISEG is to examine plant operating characteristics, NRC issuances, Licensing Information Service advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG is to perform independent review and audits of plant activities including maintenance, modifications, operational problems, and operational analysis and aid in the establishment of programmatic requirements for plant activities."

"Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable. ISEG will then be in a position to advise utility management on the overall quality and safety of operations."

9007020203 900627 PDR ADOCK 05000456 PDC PDC In NUREG-0800, Section 13.4, Item II.3.b., it is further stated, "That group shall be comprised of a minimum of five dedicated, full-time engineers, located onsite, but reporting offsite to a corporate official who holds a high-level, technically oriented position who is not in the management chain for power production. For utilities with multiple sites, it may be possible to perform portions of the independent safety assessment function in a centralized location for all the utility's plants. In such cases, an onsite group is still required, but it may be slightly smaller than would be the case if it were performing the entire independent safety assessment." For example, the ISEG for TVA's Sequoyah plants has been authorized by the NRC staff to be composed of three members. Additionally, this amendment request was approved by the NRC staff for the Byron Station on July 1, 1988.

CECo has two additional organizations which perform an independent review and audit function. The Onsite Quality Assurance Group performs audits and surveillances of various production activities and are independent of the production function. The Licensing and Plant Support Services Group (LPSSG) reports to the Senior Vice President of Nuclear Operations as does the Vice President for PWR operations. This LPSSG has both onsite and offsite elements which monitor station performance, conduct technical assessments, coordinate off-normal event investigations, and implement regulatory performance improvement and trending programs. The information obtained by these two groups is shared with ONSG and is utilized by the ONSG in performing its review and audit functions.

Thus, many of the functions that NUREG-0737, Item I.B.1.2, requires of the ONSG are being accomplished by the Onsite Quality Assurance Group and the LPSSG. The mission of the ONSG can be accomplished more efficiently by using the data and reports generated by these two other groups. Based on this, and based on the licensee's ability to supplement the ONSG personnel with engineering personnel from the corporate nuclear safety staff, the NRC staff concludes that reducing the ONSG to three members is acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The NRC staff has further 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or health and safety of the public.

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Principal Contributor: Stephen P. Sands

Dated: June 27, 1990

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