

September 17, 2002

Mr. John L. Skolds, President  
Exelon Nuclear  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - ISSUANCE OF  
AMENDMENTS FOR STAFF QUALIFICATIONS (TAC NOS. MB2688 AND  
MB2689)

Dear Mr. Skolds:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 194 to Facility Operating License No. DPR-19 and Amendment No. 187 to Facility Operating License No. DPR-25 for the Dresden Nuclear Power Station, Units 2 and 3. The amendments are in response to your application dated August 1, 2001, as supplemented by letters dated June 19 and September 9, 2002.

The amendments revise Technical Specification 5.3, "Unit Staff Qualifications," concerning approval of the education and experience eligibility requirements for operator license applicants.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Lawrence W. Rossbach, Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 194 to DPR-19  
2. Amendment No. 187 to DPR-25  
3. Safety Evaluation

cc w/encls: See next page

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**ADAMS Accession Number: ML022050125** \*Concurred by memo dated 7/12/02

OFFICE	PM:LPD3-2	LA:LPD3-2	SC:IOLB	OGC	SC:LPD3-2
NAME	LRossbach	CRosenberg	DTrimble*	AFernandez	DPickett for AMendiola
DATE	09/10/02	09/11/02	07/12/02	09/16/02	09/17/02

**OFFICIAL RECORD COPY**

## Dresden Nuclear Power Units 2 and 3

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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 194  
License No. DPR-19

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Exelon Generation Company, LLC (the licensee) dated August 1, 2001, as supplemented by letters dated June 19 and September 9, 2002, 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.
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. DPR-19 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

***/RA Douglas V. Pickett for/***

Anthony J. Mendiola, Chief, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: September 17, 2002

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 187  
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Exelon Generation Company, LLC (the licensee) dated August 1, 2001, as supplemented by letters dated June 19 and September 9, 2002, 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.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 187, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

***/RA Douglas V. Pickett for/***

Anthony J. Mendiola, Chief, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: September 17, 2002

ATTACHMENT TO LICENSE AMENDMENT NOS. 194 AND 187

FACILITY OPERATING LICENSE NOS. DPR-19 AND DPR-25

DOCKET NOS. 50-237 AND 50-249

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

Remove Pages

5.3-1

Insert Pages

5.3-1



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 194 TO FACILITY OPERATING LICENSE NO. DPR-19  
AND AMENDMENT NO. 187 TO FACILITY OPERATING LICENSE NO. DPR-29  
EXELON GENERATION COMPANY, LLC  
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3  
DOCKET NOS. 50-237 AND 50-249

## 1.0 INTRODUCTION

By letter dated August 1, 2001, Exelon Generation Company, LLC (Exelon, parent company of the licensees of the following plants) submitted an application for license amendments for Braidwood Station, Units 1 and 2; Byron Station, Units 1 and 2; Clinton Power Station; Dresden Nuclear Power Station, Units 2 and 3; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Oyster Creek Nuclear Generating Station; Peach Bottom Atomic Power Station, Units 2 and 3; Three Mile Island Nuclear Station, Unit 1; and Quad Cities Nuclear Power Station, Units 1 and 2, to the Nuclear Regulatory Commission (NRC) for approval. Exelon provided additional information by letters dated June 19 and September 9, 2002. Exelon requested approval of changes to the plant-specific technical specifications (TSs) to revise the requirements regarding facility staff qualifications and licensed operator and non-licensed personnel training programs. The application stated that the 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 Part 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." Additional information was provided by Exelon in its letters of June 19 and September 9, 2002. Exelon's June 19 and September 9, 2002, letters provided clarifying information within the scope of the original application and did not change the NRC staff's proposed no significant hazard consideration dated October 31, 2001 (66 FR 55018).

While Exelon's application covered all its nuclear facilities listed above, this safety evaluation is specific for Dresden Nuclear Power Station, Units 2 and 3.

## 2.0 REGULATORY BACKGROUND

On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel which endorsed the training accreditation process and the National Academy for Nuclear Training (NANT). In Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Conforming Amendments," dated March 19, 1987, and in 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, the NRC staff indicated it would accept a facility's licensed operator training program if the facility certified in writing that the program was accredited and based on a systems approach to

training (SAT). This certification would supersede the requirement of American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," and ANSI/ANS-3.1-1978, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." Facility licensees were advised to submit a request to the NRC for an administrative change to their licensing documents to revise or delete, as appropriate, the requirements that had been superseded.

In 1992 the NRC published its proposed rule 10 CFR 50.120. The proposed rule stated that, if adopted, the rule would supersede the Policy Statement on Training and Qualification of Nuclear Power Plant Personnel and would not result in any change to accredited programs. The NRC concluded that accredited programs, implemented consistent with industry objectives and criteria would be in compliance with this regulation. In April 1993, the NRC published its final rule on training and qualification of nuclear power plant personnel. The rule requires nuclear power plant licensees to establish, implement, and maintain SAT-based training programs for nine non-licensed positions. Accreditation of these nine training programs is an acceptable means of meeting the requirements of 10 CFR 50.120.

On January 18, 2001, the NRC published NRC Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," to familiarize licensees with the NRC's current guidelines for the qualification and training of reactor operator and senior operator license applicants. RIS 2001-01 acknowledged that 10 CFR 55.31(a)(4) allows the NRC to accept an application for an operator's license if the facility licensee certifies that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training. In addition, RIS 2001-01 stated that: (1) a training program would be considered approved by the NRC when it receives or renews accreditation from the National Nuclear Accrediting Board (NNAB); (2) accreditation of operator training programs suggests that facilities are implementing the education and experience guidelines endorsed by the NNAB; (3) NANT guidelines for education and experience (those in effect in 1987 or those issued in January 2000) outline acceptable methods for implementing the Commission's regulations; and (4) the NRC staff encourages all facility licensees to review their requirements and commitments related to licensed operator and senior operator education and experience and to update their documentation (e.g., Final Safety Analysis Report, Technical Specifications, and training program descriptions) to "enhance consistency and minimize confusion."

### 3.0 TECHNICAL EVALUATION

The changes proposed by Exelon will revise, clarify, or delete, as appropriate, requirements regarding facility staff qualifications and licensed operator and non-licensed personnel training programs at the facilities named above in Section 1.0. The requested changes will update requirements that had been outdated based on licensed operator training programs being accredited by INPO, promulgation of the revised 10 CFR 55, and adoption of a systems approach to training as required by 10 CFR 50.120.

The licensed operator training programs and the training programs for the nine non-licensed positions required by 10 CFR 50.120 at the Exelon facilities are accredited by the NNAB and are based on a systems approach to training as stated in writing in the August 1, 2001, submittal.

Proposed Technical Specification Section 5.3, "Unit Staff Qualifications," describes the requirements for facility/unit staff qualifications. In addition, the education and experience eligibility requirements for reactor operator and senior reactor operator license applicants will be described in applicable station training procedures. The revised wording of this section specifies that "the education and experience eligibility requirements of the operator license applicants, and changes thereto, shall be approved by the NRC and described in an application station training procedure." Changes to the procedures addressing issues other than education and experience eligibility requirements may be made consistent with the Exelon procedure revision process. Exelon stated that a note will be added to the applicable procedures to serve as a reminder for the procedure writer to ensure that the requirements imposed by this TS section is followed (i.e., content of the applicable sections/pages will not be changed without prior NRC approval).

The NRC staff concludes that the modified education and experience eligibility requirements in Section 5.3 of the TS for Dresden Nuclear Power Station, Units 2 and 3, and the procedural excerpts providing education and experience eligibility flowcharts as described in the submittal of June 19, 2002, are adequate because they conform with the reactor operator and senior reactor operator license eligibility criteria and standards acceptable to the NRC, and, per the wording in the TSs, affords the NRC final approval authority of changes to eligibility criteria contained within the applicable procedures. In order to assure that approval of future changes to the operator qualifications will be done by a license amendment, the staff clarified the TS by adding a specific document reference (the licensee's letter of June 19, 2002) that contains the operator qualifications. The licensee's letter of September 9, 2002, acknowledged that this clarification was being added to the TSs. In addition, the changes will not affect the 10 CFR 50.36(c)(5) requirement to ensure the licensee maintains administrative controls that assure the operation of the facility in a safe manner.

#### 4.0 SUMMARY

The NRC staff concludes that the modified education and experience eligibility requirements in Section 5.3 of the TS and the procedural excerpts providing education and experience eligibility flowcharts submitted with the June 19, 2002, submittal are adequate because they conform with the reactor operator and senior reactor operator license eligibility criteria and standards acceptable to the NRC, and that with the revised TS wording and reference to the licensee's June 19, 2002, letter, it is clear that the NRC has final approval authority through the license amendment process for changes to eligibility criteria. Further, the proposed TS changes are consistent with 10 CFR Part 55 and 10 CFR 50.120 and do not adversely affect nuclear safety or plant operations.

#### 5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State Official was notified of the proposed issuance of the amendment. The state official had no comments.

#### 6.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impacts

statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 7.0 CONCLUSION

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

Principal contributor: R. Pelton

Date: September 17, 2002