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Nuclear

Exelon Generation
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10 CFR 50.90

RS-07-078
5928-07-20108
2130-07-20496

July 19, 2007

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
Renewed 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

Oyster Creek Nuclear Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

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

Three Mile Island Nuclear Station, Unit 1
Facility Operating License No. DPR-50
NRC Docket No. 50-289

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Eligibility Requirements for Licensed Operators
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Subject: License Amendment Request to Change Technical Specification Unit Staff Qualifications Education and Experience Eligibility Requirements for Licensed Operators

Reference: Letter from K. R. Jury (Exelon Generation Company, LLC) to U. S. NRC, "Revision to Technical Specification Change Request-Clarification of Requirements for Licensed Operator Qualification and Training," dated June 19, 2002

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) are requesting changes to the Technical Specifications (TS), Appendix A of the facility operating licenses listed above.

The proposed changes will change the licensed operator training and qualification education and experience eligibility requirements made in the referenced letter, dated June 19, 2002, to the eligibility requirements specified in this letter, dated July 19, 2007. The proposed eligibility requirements correspond to the eligibility requirements contained in National Academy for Nuclear Training (NANT) Academy Document (ACAD) 00-003, Revision 1, "Guidelines for Initial Training and Qualification of Licensed Operators."

Attachment 1 to this letter provides the evaluation of the proposed changes and the no significant hazards consideration determination. Attachment 2 provides the existing TS pages marked-up to show the proposed changes.

These proposed changes have been reviewed and approved by each station's Plant Operations Review Committee and Nuclear Safety Review Board.

There are no regulatory commitments contained within this letter. EGC and AmerGen request approval of the proposed license amendment by July 19, 2008. Once approved, the amendments shall be implemented within 60 days.

The States of Illinois, New Jersey, and Pennsylvania are being notified of this request for changes to the TSs by transmitting a copy of this letter and its attachments to the designated State officials.

Should you have any questions concerning this letter, please contact Frank J. Mascitelli at (610) 765-5512.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 19th day of July 2007.

Respectfully,



Pamela B. Cowan
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC
AmerGen Energy Company, LLC

Attachments:

1. Evaluation of Proposed Changes
2. Proposed Technical Specifications (Marked-Up Pages)

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
C. Gratton - NRC Project Manager, NRR - (EGC/AmerGen Fleet)
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 - Oyster Creek Nuclear Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Three Mile Island Nuclear Station Unit 1
NRC Project Manager, NRR - Braidwood Station
NRC Project Manager, NRR - Byron Station
NRC Project Manager, NRR - Clinton Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station
NRC Project Manager, NRR - LaSalle County Station
NRC Project Manager, NRR - Oyster Creek Nuclear Generating Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - Quad Cities Nuclear Power Station
NRC Project Manager, NRR - Three Mile Island Nuclear Station Unit 1
Illinois Emergency Management Agency - Division of Nuclear Safety
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental
Resources
Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental
Protection
Chairman, Board of County Commissioners of Dauphin County, PA
Chairman, Board of Supervisors of Londonderry Township, PA
Mayor of Lacey Township, Forked River, NJ
R. I. McLean, State of Maryland
R. R. Janati, Commonwealth of Pennsylvania

Attachment 1
Evaluation of Proposed Changes

Technical Specification Unit Staff Qualification Changes for Braidwood Station, Byron Station, Clinton Power Station, Dresden Nuclear Power Station, LaSalle County Station, Oyster Creek Nuclear Generating Station, Peach Bottom Atomic Power Station, Quad Cities Nuclear Power Station and Three Mile Island Nuclear Station

- 1.0 DESCRIPTION
- 2.0 PROPOSED CHANGE
- 3.0 BACKGROUND
- 4.0 TECHNICAL ANALYSIS
- 5.0 REGULATORY ANALYSIS
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements/Criteria
- 6.0 ENVIRONMENTAL CONSIDERATION
- 7.0 PRECEDENT
- 8.0 REFERENCES

Attachment 1
Evaluation of Proposed Changes

1.0 DESCRIPTION

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) are requesting that the Technical Specifications (TS), Appendix A of the facility operating licenses for Braidwood Station, Byron Station, Clinton Power Station, Dresden Nuclear Power Station, LaSalle County Station, Oyster Creek Nuclear Generating Station, Peach Bottom Atomic Power Station, Quad Cities Nuclear Power Station, and Three Mile Island Nuclear Station under Facility Operating License Nos. NPF-72 and NPF-77, NPF-37 and NPF-66, NPF-62, DPR-19 and DPR-25, NPF-11 and NPF-18, DPR-16, DPR-44 and DPR-56, DPR-29 and DPR-30, DPR-50, respectively, be amended as proposed to permit changes to the Unit Staff Qualification education and experience eligibility requirements for licensed operators. The proposed education and eligibility requirements for licensed operators are the same requirements contained in the National Academy for Nuclear Training (NANT) Academy Document, ACAD 00-003, Revision 1, dated April 2004 (Ref 1). The proposal will bring EGC and AmerGen sites in alignment with current industry practices and facilitate the development of a pre-initial licensed operator training (ILT) program.

This proposed License Amendment Request (LAR) involves revising TS Sections 5.3.1/6.3.1, "Unit Staff Qualifications," for operator license applicants in accordance with current industry standards for education and experience eligibility requirements.

These proposed eligibility requirements are identical to the reactor operator and senior reactor operator eligibility requirements contained in NANT ACAD 00-003, Guidelines for Initial Training and Qualification of Licensed Operators, Revision 1, dated April 2004.

This LAR provides a discussion and description of the proposed TS changes, a safety assessment of the proposed TS changes, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

2.0 PROPOSED CHANGE

Proposed Typical Change to TS 5.3.1/6.3.1

"the education and experience eligibility requirements for operator license applicants (described in Exelon letter RS-07-078, dated July 19, 2007), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure."

3.0 BACKGROUND

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

Attachment 1
Evaluation of Proposed Changes

ACAD 00-003, Revision 1, and NUREG-1021, Revision 9, allow time spent in training before entering the ILT to qualify as experience, but time spent in an NRC-approved training program leading up to license eligibility should normally not be double-counted as experience. Our current regulatory requirement, as described in flow charts attached to RS-02-100 letter (Ref 2) referenced in TS 5.3.1/6.3.1, and original submittal letter (Ref 3) do not allow any pre-ILT training to count for on-site experience. The purpose of this license amendment request is to revise Exelon and AmerGen licensed operator education and experience eligibility regulatory requirements to be consistent with Revision 1 of ACAD 00-003 so that pre-ILT training can count for on-site experience.

4.0 TECHNICAL ANALYSIS

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 program developed by INPO, in association with its National Academy for Nuclear Training (NANT). The NRC has documented approval and acceptance of NANT guidelines in RIS 2001-01, "Eligibility of Operator License Applicants," NUREG-1021, Revision 9, "Operator Licensing Examination Standards For Power Reactors," and Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants." These documents state that a facility licensee's training program would be considered approved by the NRC when it is accredited by the National Nuclear Accrediting Board and that NANT guidelines for education and experience outline acceptable methods for implementing the NRC's regulation in this area. The TS Facility Staff qualifications are being revised to the current ACAD 00-003, Revision 1, eligibility requirements and therefore are acceptable to the NRC.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) have evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Will operation of the facility in accordance with the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

Licensed operator qualification and training can have an indirect impact on accidents previously evaluated. However, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55 rule, determined that this impact remains acceptable when licensees have an accredited licensed operator training program which is based on a systems approach to training (SAT). The NRC has concluded in RIS 2001-01 and NUREG-1021 that standards and guidelines applied by INPO in their accredited training programs are equivalent to those put forth by or endorsed by the NRC. Therefore, maintaining an INPO accredited SAT licensed operator training program is equivalent to maintaining an NRC approved licensed operator training program which conforms with applicable NRC

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Evaluation of Proposed Changes

Regulatory Guidelines or NRC endorsed industry standards. The proposed changes conform to ACAD 00-003, Revision 1 licensed operator education and experience eligibility requirements.

Based on the above, EGC and AmerGen conclude that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed amendment involves changes to the licensed operator training programs, which are administrative in nature. The EGC and AmerGen licensed operator training programs have been accredited by INPO and are based on SAT.

Based on the above discussion, EGC and AmerGen conclude that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed TS changes are administrative in nature. The proposed TS changes do not affect plant design, hardware, system operation, or procedures for accident mitigation systems. The proposed changes do not impact the performance or proficiency requirements for licensed operators. As a result, the ability of the plant to respond to and mitigate accidents is unchanged by the proposed TS changes. Therefore, these changes do not involve a significant reduction in a margin of safety.

Based on the above, EGC and AmerGen conclude that the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above evaluation of the three criteria, EGC and AmerGen conclude that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

10 CFR 50

10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," Section 120, "Training and Qualification of Nuclear Power Plant Personnel," requires that each nuclear power plant licensee or applicant for an operator license implement training and qualification programs that are derived from a systems approach to training. The proposed license amendment conforms to these requirements.

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Evaluation of Proposed Changes

10 CFR 55

10 CFR 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education and experience and other related matters. The proposed license amendment conforms to these requirements.

NUREG-1021, Revision 9

NUREG-1021, "Operator Licensing Examination Standards For Power Reactors," Section ES-202, "Preparing and reviewing Operator Licensing Application," states, in part, that "the fact that every facility licensee has voluntarily obtained and periodically renewed the accreditation of its licensed operator training program suggests that every facility licensee is implementing the education and experience guidelines endorsed by the NNAB. Specifically, the NRC staff has stated that the current version of those guidelines is outlined in the NANT 'Guidelines for Initial Training and Qualification of Licensed Operators,' which were issued in January 2000 (NANT 2000 guidelines). Consequently, unless otherwise informed by a facility licensee, the NRC staff has stated that the education and experience guidelines described in the NANT 2000 guidelines constitute the facility licensee's education and experience requirements to be licensed as an RO or SRO." The proposed license amendment conforms to the NANT ACAD 00-003, Revision 1, education and experience eligibility requirements.

Regulatory Guide (RG) 1.8, Revision 3

RG 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC staff finds acceptable for complying with the NRC's regulations with regard to training and qualification of nuclear power plant personnel. The NRC has reviewed the current education and experience guidelines outlined in the NANT ACAD 00-003, Revision 1, 'Guidelines for Initial Training and Qualifications of Licensed Operators,' and concluded that they are equivalent to the NRC staff guidelines in RG 1.8, Revision 3, as discussed in two pre-submittal teleconferences with NRC subject matter experts. The proposed license amendment conforms to the NANT ACAD 00-003, Revision 1, education and experience eligibility requirements.

In conclusion, based on the considerations discussed above, (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 NRC's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment does not change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR 20 and does not change surveillance requirements. The proposed amendment revises Technical Specifications for Facility Staff Qualification education and experience eligibility requirements for reactor and senior reactor operator applicants that will allow for the development of an ILT training program. The proposed amendment does not involve (i) a significant hazards consideration, (ii) a

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significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, in accordance with 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 PRECEDENT

A similar amendment was approved for Wolf Creek Generating Station on January 31, 2005 (TAC NO. MC4795, ML050340189).

8.0 REFERENCES

1. National Academy for Nuclear Training Academy Document 00-003, Revision 1, "Guidelines for Initial Training and Qualification of Licensed Operators," dated April 2004
2. RS-02-100, Letter from K. R. Jury (Exelon Generation Company, LLC) to U. S. NRC, "Revision to Technical Specification Change Request – Clarification of Requirements for Licensed Operator Qualification and Training," dated June 19, 2002
3. Letter from K. A. Ainger (Exelon Generation Company, LLC) to U. S. NRC, "Request for Technical Specifications Changes to Clarify Requirements for Licensed Operator Qualifications and Training," dated August 1, 2001

Attachment 2

Proposed Technical Specifications (Marked-Up Pages)

Technical Specification Unit Staff Qualification Changes for Braidwood Station, Byron Station, Clinton Power Station, Dresden Nuclear Power Station, LaSalle County Station, Oyster Creek Nuclear Generating Station, Peach Bottom Atomic Power Station, Quad Cities Nuclear Power Station and Three Mile Island Nuclear Station

Braidwood Units 1 & 2 TS page 5.3-1

Byron Units 1 & 2 TS page 5.3-1

Clinton TS page 5.0-5

Dresden Units 2 & 3 TS page 5.3-1

La Salle Units 1 & 2 TS page 5.3-1

Oyster Creek TS page 6-2a

Peach Bottom Unit 2 TS page 5.0-5

Peach Bottom Unit 3 TS page 5.0-5

Quad Cities Unit 1 & 2 TS page 5.3-1

Three Mile Island Unit 1 TS page 6-3

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 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, (described in Exelon letter ~~RS-02-100~~, dated ~~June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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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 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, (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, with the following exception: the education and experience eligibility requirements for operator license applicants (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 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, ✓ (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 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, (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure. Also, the ANSI N18.1-1971 qualification requirements for "radiation protection technician" may be met by either of the following alternatives:

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- 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.
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- 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, with the following exceptions: 1) the education and experience eligibility requirements for operator license applicants (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), 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.

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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.

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 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 (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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).

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI 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 (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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).

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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, with the following exceptions: 1) 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, (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), and changes thereto, shall be approved by the NRC and described in an applicable station training procedure.

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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, with the following exceptions: 1) the education and experience eligibility requirements for operator license applicants (described in Exelon letter ~~RS-02-100, dated June 19, 2002~~), 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 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.

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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 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.