

RS-09-038
March 11, 2009

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Supplemental Letter Supporting License Amendment Request to Remove References to NRC Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours"

Reference: Letter from D. M. Benyak (Exelon Generation Company, LLC) to U. S. NRC, "License Amendment Request to Remove References to NRC Generic Letter 82-12, 'Nuclear Power Plant Staff Working Hours,'" dated April 21, 2008

In the above referenced document, Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) requested an amendment to the referenced facility operating licenses. The proposed change removes references to NRC Generic Letter (GL) 82-12, "Nuclear Power Plant Staff Working Hours." Technical Specifications (TS) for the stations either refer or adhere to GL 82-12 work hours guidelines in the administrative controls section. Published on June 15, 1982, these guidelines will be superseded at the issuance of 10 CFR 26, Subpart I, "Managing Fatigue." Removal of references to GL 82-12 will support the requirement to be in compliance with 10 CFR 26, Subpart I by October 1, 2009.

It was subsequently determined that the proposed markups for two stations, Clinton Power Station (CPS) and LaSalle County Station (LSCS), could cause additional administrative burden by requiring the renumbering of the affected administrative controls section in TS 5.2.2, "Unit Staff." To address this, EGC is proposing to revise the original markups for CPS to insert the word "Deleted" into the section being revised to eliminate the reference to GL 82-12, thereby maintaining the current section numbering. EGC is proposing to revise the original markups for LSCS to correct a reference to a renumbered section. Revised markups for CPS and LSCS are provided in Attachments 1 and 2, respectively.

Attachment 1 to this letter provides revised markups for the affected CPS TS pages and Attachment 2 provides revised markups for the affected LSCS TS pages. The proposed changes provided in Attachments 1 and 2 supersede the changes proposed for CPS and LSCS in Attachment 2 to the referenced letter.

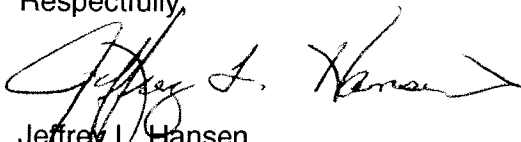
EGC has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Attachment 1 of the referenced letter. The supplemental information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration.

There are no regulatory commitments contained within this letter. In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," EGC is notifying the state of Illinois of this supplement to the application for TS changes 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 Ms. Michelle Yun at (630) 657-2818.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th day of March 2009.

Respectfully,



Jeffrey L. Hansen
Manager – Licensing

Attachment 1: Revised Markups for Clinton Power Station
Attachment 2: Revised Markups for LaSalle County Station

ATTACHMENT 1
Revised Markups for Clinton Power Station

5.2 Organization

5.2.2 Unit Staff (continued)

- b. At least one licensed RO shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed SRO shall be present in the control room.
- c. Shift crew composition may be one less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Deleted.

- e. ~~Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, non-licensed operators, and key maintenance personnel).~~

~~Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:~~

- ~~1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;~~
- ~~2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;~~
- ~~3. A break of at least 8 hours should be allowed between work periods, including shift turnover time; and~~

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

~~4. 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 plant manager or his designee, in accordance with administrative procedures with documentation of the basis for granting the deviation.~~

~~Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the plant manager, or his designee, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.~~

- f. The operations manager or at least one operations middle manager shall hold an SRO license for Clinton Power Station.
- g. The Shift Technical Advisor (STA) shall provide advisory technical support to the SS in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

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ATTACHMENT 2
Revised Markups for LaSalle County Station

5.2 Organization

5.2.2 Unit Staff (continued)

non-licensed operators shall be assigned to each unit.

- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.~~g~~ for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
 - e. ~~d.~~ A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
 - ~~d. The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 02-12).~~
 - ~~d.~~ e. The operations manager or shift operations supervisor shall hold an SRO license.
 - ~~e.~~ f. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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