



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

December 29, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Byron Station Units 1 and 2
Operating Staff Experience
NRC Docket Nos. 50-454/455



Dear Mr. Denton:

This is to provide information regarding the PWR operating experience of the Byron operating staff. This subject has been discussed with the NRC Staff in meetings relating to the review of Chapter 13 of the Byron/Braidwood FSAR. It has become apparent that some requirement is contemplated for assignment to each operating crew of personnel previously licensed on a commercial PWR. Such a requirement would be burdensome and is unnecessary from a safety standpoint. The operating staff and the utility as licensee have sufficient experience in the operation of commercial power reactors to obviate the need for special requirements in this area.

Byron Station will be the fifth nuclear generating station that Commonwealth Edison has placed in operation since 1959. It is similar in many respects to Zion Station which began operation in 1973. These generating stations consist of two 1100 MWe Westinghouse pressurized water reactor units with Westinghouse turbine-generators. Sargent and Lundy was the architect engineer and Commonwealth Edison acted as prime contractor for the projects. All flushing, test and startup activities are directed by Commonwealth Edison personnel. In addition, an experienced offsite staff supports the onsite staff of all Commonwealth Edison nuclear plants in all aspects of engineering, test review and operation. The company has over 80 reactor years of commercial power reactor operating experience. Employee nuclear operating experience totals several thousand reactor years.

To derive the direct benefit of this experience, personnel selection for Byron Station's initial and subsequent manning consisted of a cross section of PWR as well as BWR qualified and experienced individuals. At the present time, the Byron Plant Superintendent is a previously licensed SRO from Commonwealth Edison's Quad Cities BWR Station. All three Assistant

8201190222 811229
PDR ADOCK 05000454
V PDR

m003
S/P

Superintendents were previously licensed as SRO's at Zion Station and one shift engineer and two shift foremen were licensed as RO's on the Zion units. Additionally, previously licensed BWR personnel on the Byron management team include four who were SRO qualified and two who are designated Shift Foremen and held RO qualifications.

To date shift personnel who will be cold licensed have passed the Westinghouse certification examination and have conducted required training on plant transients and evolutions at the Westinghouse simulator at Zion, Illinois. During scheduled shift time at Byron, personnel have benefited from on-the-job experience in the conduct of system flushing, system walkdowns for turnover for testing, pretesting, and post-testing activities. Licensed candidates will also derive plant experience from their involvement in the ECCS full flow and hot functional testing programs. In addition, shift personnel have spent time on shift at Zion Station to witness plant operations and gain first hand on-the-job experience. Other operating staff personnel and previously licensed staff personnel will also participate in the testing program and have reviewed pre-operational tests as members of the Test Review Board.

As the testing and startup programs progress, experienced personnel from within the station will be available to assist the shift personnel in the conduct of new plant or special evolutions. Furthermore, PWR qualified personnel are available from other company departments to provide assistance should the need arise.

We are confident that the Byron startup and power ascension program has sufficient well trained and experienced personnel to assure the safe startup of the plant. We would be happy to discuss this matter further with the NRC over the phone or in a meeting. Please address questions regarding this matter to this office.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,



T. R. Tramm
Nuclear Licensing Administrator
Pressurized Water Reactors

cc: Kevin Connoughton, Region III
3116N