



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

DOCKETED
 USNRC-

September 27, 1982

DOCKET NUMBER

(17)

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PROPOSED RULE

PR-50

Secretary of the Commission
 U. S. Nuclear Regulatory Commission
 Washington, D. C. 20555

(47 FR 38135)

OFFICE OF SELECTED
 DOCKETING & SERVICE
 BRANCH

Attention: Docketing and Service Branch

Subject: Proposed Rule "Licensed Operator Staffing at Nuclear Power
 Units" (47 FR 38135 August 30, 1982)

Dear Sir:

Commonwealth Edison has reviewed the subject proposal. In it, the SRO assigned the Control Room responsibility "shall, at all times, be in the Control Room". This SRO should be allowed to be absent from the Control Room for 10 to 15 minute periods. We are presently encouraging our personnel to get out in the plant in order to provide them a more thorough work experience on shift. The requirement to have the SRO domiciled to the Control Room would, in our judgment, contribute to a parochial viewpoint of plant operation, and possibly, be a negative contributor to overall plant safety.

With regard to the implementation schedule proposed, only our Quad Cities Station will be unable to meet the January 1, 1983 deadline. Our program for meeting this minimum shift manning is documented in the E. D. Swartz to D. G. Eisenhut letter dated April 27, 1982.

With the exception noted above, we concur with the proposed rule. We appreciate having been given the opportunity to comment.

Respectfully,

L. O. DelGeorge

L. O. DelGeorge
 Director Nuclear Licensing

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

April 27, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 & 2
Zion Station Units 1 and 2
NUREG 0737 Item I.A.1.3.2,
"Shift Manning Requirements"
and Item I.A.1.1, "STA"
NRC Docket Nos. 50-237/249,
50-254/265 and 50-295/304

- References (a): J. S. Abel letter to D. G. Eisenhut
dated March 17, 1981.
- (b): D. M. Crutchfield letter to L.
DelGeorge dated January 7, 1982.
- (c): S. A. Varga letter to L. DelGeorge
dated January 7, 1982.

Dear Mr. Eisenhut:

References (b) and (c) requested that the Commonwealth Edison Company review our implementation schedule for NUREG 0737 item I.A.1.3.2 at our Dresden, Quad Cities and Zion Stations, to ensure that the July 1, 1982, deadline will be met. We were requested to provide the Staff with sufficient documentation to enable their review, if our review revealed any problems.

As a result of our review, we have not identified any problems in meeting this deadline at our Dresden or Zion Stations. However, we have identified problems which will make it impossible to meet the July 1, 1982, implementation deadline at our Quad Cities Station. As detailed in Attachment A, our Quad Cities Station will not be able to meet the Item I.A.1.3.(2) requirement for an SRO in the Control Room on all shifts until mid-March, 1983. Additionally, Quad Cities will be short one (1) qualified STA from May 1, 1982, through August 1, 1982, which conflicts with our previous commitments to Item I.A.1.1(4).

Based upon our proposed corrective actions and justifications presented in Attachment A to this letter, we hereby request Commission approval to delay the implementation schedules at our Quad Cities Station for these items.

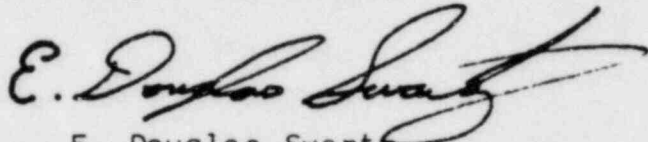
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April 27, 1982

Please address any questions that you or your staff may have concerning this matter to this office.

One (1) signed original and seventy-nine (79) copies of this letter are provided for your use.

Very truly yours,



E. Douglas Swartz
Nuclear Licensing Administrator

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Attachment

cc: J. G. Keppler - RIII
Region III Inspector - Dresden
Region III Inspector - Quad Cities
Region III Inspector - Zion

4003N

Attachment A

COMMONWEALTH EDISON COMPANY

Dresden Station, Units 2 and 3

Quad Cities Station Units 1 and 2

Zion Station Units 1 and 2

NUREG 0737 Items I.A.1.1.(4) and I.A.1.3.(2) - Discussion
of our current Quad Cities Station Control Room Engineer
(SCRE) personnel shortfalls.

4003N

I.A.1.1 (4) Shift Technical Advisor Long Term Program

and

I.A.1.3 (2) Minimum Shift Crew

As described in Reference (a), and references contained therein, the NUREG 0737 requirements for an SRO in the Control Room and an STA on every shift is being met by our Station Control Room Engineer (SCRE). This SCRE position is filled by an individual who is a technical graduate with an SRO license, and additional training beyond the SRO to qualify as an STA. These positions have been filled and functioning for quite some time at our Dresden, Quad Cities and Zion Stations.

However, recent developments beyond our control, now preclude our ability to meet the NRC requirement of an SRO in the Control Room on every shift by the July 1, 1982 implementation deadline and an STA on shift meeting the long term training requirements as committed to in Reference (a) at Quad Cities Station.

Currently, Quad Cities has four (4) fully qualified SCREs and one (1) individual who took the SCRE training but subsequently failed the NRC SRO licensing exam; thus the station only has four (4) SCREs and one (1) fully qualified STA all of whom have been on shift for several months.

Quad Cities Station started in early 1980, to train six (6) SCREs to meet the dual requirements of an STA on shift and an SRO in the Control Room. Subsequently, one (1) of the SCRE candidates resigned. In 1981, another SCRE candidate was placed in training to replace this individual and provide for the desired six (6) SCREs we believe are necessary to meet our commitments. As noted above, of the six (6) candidates, one (1) failed the SRO exam. Thus we had five (5) SCREs and one (1) fully qualified STA; still a sufficient number to meet our commitment (albeit a somewhat precarious position not allowing for attrition).

In early 1982, another individual at Quad Cities tendered his resignation. This shortfall, along with other considerations, precipitated the promotion of one (1) of the SCREs to the position of Technical Staff Supervisor resulting in our current situation of four (1) SCREs and one (1) STA. Further, in mid-March of 1982, another SCRE tendered his resignation effective April 30, 1982; this individual has accepted a position with the NRC in Region II. Thus on May 1, 1982, Quad Cities Station will have three (3) SCREs and one (1) STA.

The Commonwealth Edison Company is aggressively pursuing a resolution to our SCRE personnel shortfalls at Quad Cities Station as follows:

- (1) Three (3) technical graduates are currently in SCRE training. These individuals will be available as SCREs in mid-March of 1983, assuming they successfully pass the SRO exam; if not, they would fully qualify as STAs.

ON
SCHEDULE

(2) Two (2) more SCREs will begin training in the summer of 1982. They will be available as SCREs in November of 1983.

(3) Four (4) other technical graduates will begin STA training shortly and will be available as STAs on August 1, 1982.

We have considered the option of using other SROs at Quad Cities Station in order to meet this July 1, 1982, requirement. However, in our judgment, Quad Cities does not have enough SROs available to do this without seriously impacting the day-to-day administrative operations. Further, to require one (1) of the two (2) SRO technical specification required positions per shift to remain in the Control Room at all times would seriously impair our current practice of monitoring activities within the plant.

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Based upon the above, we find no acceptable alternative but to request Commission approval to delay the implementation of NUREG 0737 Item I.A.1.3.(2) at our Quad Cities Station. We propose to meet the SRO in the Control Room requirement by mid-March, 1983, contingent on the three (3) SCREs now in training obtaining their SRO licenses. Additional margin should be afforded in November of 1983 when two (2) more SCREs will be available, again contingent on their successfully completing the SRO exam.

With respect to the STA requirement, we will be short one (1) STA who meets our training commitments for that position from May 1, 1982 through August 1, 1982. In order to cover this deficit, we will provide an STA who meets the intent of the STA requirements of the H. R. Denton letter dated October 30, 1979 until such time as a fully qualified STA is available. Four (4) such qualified STAs should be available August 1, 1982.

It is our belief that our proposed variance to NUREG 0737 for these items will in no way compromise reactor safety at our Quad Cities Station.