



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

August 30, 1982

Mr. A. Schwencer, Chief
Licensing Branch #2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Personnel Changes
NRC Docket Nos. 50-373 and 50-374

- References (a): LSCS FSAR Section 13.1.3.1.
(b): LSCS SER Section 13.1.
(c): ANSI N18.1-1971.
(d): LSCS Technical Specifications
Section 6.1.D.
(e): LSCS Technical Specifications
Figure 6.1-2.

Dear Mr. Schwencer,

The purpose of this letter is to document discussions today between Dr. A. Bournia and Mr. G. Rivenbark of your staff and C. W. Schroeder of Commonwealth Edison.

Commonwealth Edison Company is considering certain personnel changes at LaSalle County Station. Included in these changes is the need to fill the position of Assistant Superintendent, Operations, which will be vacated due to promotion of the incumbent to the position of Superintendent.

A review of the pertinent documentation reveals the following regarding the requirements for the individual holding the position of Assistant Superintendent, Operations:

1. Reference (a) commits LSCS to ANSI N18.1-1971, lists plant staff positions and designates ANSI N18.1-1971 equivalent titles. For the position of Assistant Superintendent, the ANSI equivalent is Assistant Plant Manager.
2. Reference (b) states that the NRC has "...reviewed the qualification requirements described in Section 13.1 of the Final Safety Analysis Report and find they meet those qualifications described in American National Standards Institute N18.1-1971..."

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3. A review of Reference (c), Section 4.2.1 Plant Managers, indicates that "The plant manager shall have acquired the experience and equivalent training normally required to be eligible for a Senior Reactor Operator's license whether or not the examination is taken." Section 4.2.2, Operations Manager, states "...the operations manager shall hold a Senior Reactor Operator's license...."
4. Reference (d) states that "Qualifications of the station management and operating staff shall meet acceptable levels as described in ANSI N18.1-1971...."
5. Reference (e) indicates that the Operating Assistant Superintendent requires a Senior Reactor Operator's license.

It is Commonwealth Edison's position that the position of Operating Assistant Superintendent does correspond to the ANSI N18.1-1971 position of Assistant Plant Manager, as committed to in Reference (a) and approved by the NRC in Reference (b). As such, it is our position that the individual fulfilling this position should NOT be required to hold a current SRO on LSCS.

It is Commonwealth Edison's understanding that the staff currently views the position of Operating Assistant Superintendent as fulfilling the ANSI position of Operations Manager and thus requiring a current SRO license.

The individual being considered for this position at LSCS has been employed by Commonwealth Edison for over 15 years. He has held an SRO license on Dresden Nuclear Power Station and has held many positions at Commonwealth Edison stations including:

- Tech Staff Supervisor (Technical Manager)
- Operating Engineer (Operations Manager)
- Operating Assistant Superintendent (Assistant Plant Manager)

In order to allow this highly qualified individual to assume the position of Operating Assistant Superintendent at LSCS, the following agreement is proposed:

"An individual who meets the requirements of ANSI N18.1-1971, for the ANSI positions of Plant Manager and Operations manager, with the sole exception that he does not hold a current SRO license on LSCS, will be allowed to assume the position of Operating Assistant Superintendent, providing

- a) He sits for the SRO examination at LSCS no later than the first opportunity after six months following his appointment to the position.
- b) Operating decisions made by this individual prior to his holding a current SRO at LSCS shall be approved by, or directed through, individuals(s) holding a current SRO license at LSCS."

A. Schwencer

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Due to the desire of Commonwealth Edison to immediately appoint an individual to this position, your expeditious review is appreciated.

If there are any further questions in this matter, please contact this office.

Very truly yours,

C. W. Schroeder 8/30/82

C. W. Schroeder
Nuclear Licensing Administrator

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