

ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A,
TECHNICAL SPECIFICATIONS OF FACILITY
OPERATING LICENSES NPF-18 AND NPF-11

REVISED PAGES

UNIT 1 (NPF-11)

UNIT 2 (NPF-18)

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*This is a new page added due to the Tech Spec Change Request

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ADMINISTRATIVE CONTROLS

1. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator who has been designated by the Shift Supervisor to assume the control room direction responsibility shall be in the Control Room.
2. A radiation protection technician* shall be on site when fuel is in the reactor.
3. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
4. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include the Shift Supervisor, the Station Control Room Engineer and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
5. The Onsite Nuclear Safety Group (ONSG) shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving unit safety. The ONSG shall be composed of at least three, dedicated, full-time engineers of multi-disciplines located on site and shall be augmented on a part-time basis by personnel from other parts of the Commonwealth Edison Company organization to provide expertise not represented in the group. The ONSG shall be responsible for maintaining surveillance of unit activities to provide independent verification[#] that these activities are performed correctly and that human errors are reduced as much as practical. The ONSG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Safety Assessment Manager and the Station Manager.
6. The Station Control Room Engineer (SCRE) ^{MAY SERVE} serves as the lead control room SRO during normal operations and as the Shift Technical Advisor (STA) during abnormal operating and accident conditions. ~~In the event of abnormal operating or accident conditions, the SCRE will relinquish his job as control room SRO to the Shift Foreman and will assume the role of STA, when he shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.~~

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* The radiation protection technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

[#] Not responsible for sign-off feature.

ADMINISTRATIVE CONTROLS

- F. Retraining shall be conducted at intervals not exceeding 2 years.
- G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

- 1. The Superintendent of the Offsite Review and Investigative Function shall be appointed by the Manager of Quality Assurance/Nuclear Safety (QA/NS). The Corporate Audit Function shall be the responsibility of the Manager of QA/NS and shall be independent of operations.

- The Manager of QA/NS reports directly to the Chief Executive officer and has the responsibility to set Corporate policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate departments to determine that QA/NS policy is being carried out.

- a. Offsite Review and Investigative Function

The Superintendent of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of non-compliance with NRC requirements to the Station Manager, Vice President BWR Operations, Manager of QA/NS, ~~Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President - Nuclear Operations.~~ During periods when the Superintendent of Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate, who satisfies the formal training and experience for the Superintendent of the Offsite Review and Investigative Function. The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

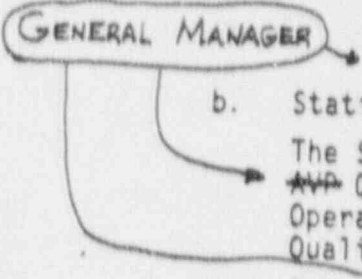
GENERAL
MANAGER →

- 1) The safety evaluations for (1) changes to procedures, equipment, or systems as described in the safety analysis report and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of QA/NS.
- 2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.

ADMINISTRATIVE CONTROLS

- 3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- 4) Proposed changes in Technical Specifications or NRC operating licenses.
- 5) Noncompliance with NRC requirements, or of internal procedures, or instructions having nuclear safety significance.
- 6) Significant operating abnormalities or deviation from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function.
- 7) All REPORTABLE EVENTS.
- 8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- 9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
- 10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations, and ~~AVP~~ Quality Programs and Assessment.

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b. Station Audit Function

The Station Audit Function shall be the responsibility of the ~~AVP~~ Quality Programs and Assessment independent of the BWR Operations. Such responsibility is delegated to the Nuclear Quality Programs Manager.

The Nuclear Quality Programs Manager, or designated Corporate Staff or Supervisor approved by the ~~AVP~~ Quality Programs and Assessment, shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within a period of 2 years or less as designated below.

- 1) Audit of the conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- 2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.
- 3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.
- 4) Audit of the performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B" 10 CFR 50.

ADMINISTRATIVE CONTROLS

Station Audit Function (Continued)

- 5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.
- 6) Audit of the Facility Security Plan and implementing procedures.
- 7) Audit onsite and offsite reviews.
- 8) Audit the Facility Fire Protection Program and implementing procedures.
- 9) The radiological environmental monitoring program and the results thereof at least once per 12 months.
- 10) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- 11) The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.
- 12) The performance of activities required by the Company Quality Assurance Program and Procedures to meet the criteria of Regulatory Guide 4.15, December 1977, at least once per 12 months.

Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, Manager of QA/NS, Vice President BWR Operations, ~~AVP~~ Quality Programs and Assessment, the Senior Vice President-Nuclear Operations, and the Chief Operations Officer.

c. Authority

The Manager of QA/NS reports to the Chief Executive Officer. The Manager of QA/NS has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

The ~~AVP~~ Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The ~~AVP~~ Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operation Officer.

d. Records

- 1) Reviews, audits, and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b
- 2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the offsite reviews and investigative functions described in Specification 6.1.G.1.a. and for the audit functions described in Specification 6.1.G.1.b. Those procedures shall cover the following:

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ADMINISTRATIVE CONTROLS

Onsite Review and Investigative Function (Continued)

The responsibilities of the personnel performing this function are stated below:

- 1) Review of (1) procedures required by Specification 6.2 and changes thereto, (2) all programs required by Specification 6.2 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- 2) Review of all proposed test and experiments that affect nuclear safety.
- 3) Review of all proposed changes to the Technical Specifications.
- 4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- 5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence;
- 6) Review of facility operations to detect potential safety hazards.
- 7) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Offsite Review and Investigative Function.
- 8) Review of the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the ~~AVP~~ Quality Programs and Assessment in lieu of distribution in accordance with Specification 6.1.G.2c(1).
- 9) Review of the Emergency Plan and station implementing procedures and identification of recommended changes;
- 10) Review of reportable events and actions taken to prevent recurrence.
- 11) Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence;
- 12) Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

GENERAL MANAGER

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation, and administrative procedures relating to facility operations and shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is

ADMINISTRATIVE CONTROLS

necessary. The Station Manager shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President BWR Operations and the Superintendent of the Offsite Review and Investigative Function.

c. Records

- 1) Reports, reviews, investigations, and recommendations prepared and performed for Specification 6.1.G.2a shall be documented with copies to the Vice President BWR Operations, the Superintendent of the Offsite Review and Investigative Function, the Station Manager, and the ~~AMP~~ GENERAL MANAGER Quality Programs and Assessment.
- 2) Copies of all records and documentation shall be kept on file at the station.

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative Function. These procedures shall include the following:

- 1) Content and method of submission and presentation to the Station Manager, Vice President BWR Operations, and the Superintendent of the Offsite Review and Investigative Function.
- 2) Use of committees.
- 3) Review and approval.
- 4) Detailed listing of items to be reviewed.
- 5) Procedures for administration of the quality control activities.
- 6) Assignment of responsibilities.

e. Personnel

- 1) The personnel performing the Onsite Review and Investigative Function, in addition to the Station Manager, shall consist of persons having expertise in:
 - a) nuclear power plant technology,
 - b) reactor operations,
 - c) reactor engineering,
 - d) radiological safety and chemist,
 - e) Instrumentation and control, and
 - f) mechanical and electric systems.
- 2) Personnel performing the Onsite Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1-1971, Sections 4.2 and 4.4.

ADMINISTRATION CONTROLS

1. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator who has been designated by the Shift Supervisor to assume the control room direction responsibility shall be in the Control Room.
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6. The Station Control Room Engineer (SCRE) ^{MAY SERVE} ~~serves as the lead control room SRO during normal operations and as the Shift Technical Advisor (STA) during abnormal operating and accident conditions. In the event of abnormal operating or accident conditions, the SCRE will relinquish his job as control room SRO to the Shift Foreman and will assume the role of STA, when he shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.~~

DURING THESE CONDITIONS, THE SCRE OR OTHER ON DUTY STA

* The radiation protection technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

Not responsible for sign-off feature.

ADMINISTRATION CONTROLS

- F. Retraining shall be conducted at intervals not exceeding 2 years.
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- a. Offsite Review and Investigative Function

The Superintendent of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of non-compliance with NRC requirements to the Station Manager, Vice President BWR Operations, Manager of QA/NS, ~~Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President - Nuclear Operations.~~ During periods when the Superintendent of Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate, who satisfies the formal training and experience for the Superintendent of the Offsite Review and Investigative Function. The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

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- 1) The safety evaluations for (1) changes to procedures, equipment, or systems as described in the safety analysis report and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of QA/NS.
- 2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.

ADMINISTRATIVE CONTROLS

- 3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- 4) Proposed changes in Technical Specifications or NRC operating licenses.
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- 6) Significant operating abnormalities or deviation from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the On-Site Review and Investigative Function.
- 7) ALL REPORTABLE EVENTS.
- 8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- 9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
- 10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations, and the AVP Quality Programs and Assessment.

b. Station Audit Function

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The Station Audit Function shall be the responsibility of the AVP Quality Programs and Assessment independent of the BWR Operations. Such responsibility is delegated to the Nuclear Quality Programs Manager.

The Nuclear Quality Programs Manager or designated Corporate Staff or Supervisor approved by the AVP Quality Programs and Assessment, shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within a period of 2 years or less as designated below.

- 1) Audit of the conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- 2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.
- 3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.

ADMINISTRATION CONTROLS

Station Audit Function (Continued)

- 4) Audit of the performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B" 10 CFR 50.
- 5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.
- 6) Audit of the Facility Security Plan and implementing procedures.
- 7) Audit onsite and offsite reviews.
- 8) Audit the Facility Fire Protection Program and implementing procedures.
- 9) The radiological environmental monitoring program and the results thereof at least once per 12 months.
- 10) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- 11) The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.
- 12) The performance of activities required by the Company Quality Assurance Program and Procedures to meet the criteria of Regulatory Guide 4.15, December 1977, at least once per 12 months.

Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, Manager of QA/NS, Vice President BWR Operations, ~~AVP~~ Quality Programs and Assessment, the Senior Vice President-Nuclear Operations, and the Chief Operations Officer.

c. Authority

The Manager of QA/NS reports to the Chief Executive Officer. The Manager of QA/NS has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

The ~~AVP~~ Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The ~~AVP~~ Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

GENERAL MANAGER

d. Records

- 1) Reviews, audits, and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b

ADMINISTRATION CONTROLS

Onsite Review and Investigative Function (Continued)

comprehensive interdisciplinary review coverage under this function; (4) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (5) report all findings of noncompliance with NRC requirements, and provide recommendations; and (6) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the Onsite Review and Investigative Function.

The responsibilities of the personnel performing this function are stated below:

- 1) Review of (1) procedures required by Specification 6.2 and changes thereto, (2) all programs required by Specification 6.2 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Station Manager to affect nuclear safety.
- 2) Review of all proposed test and experiments that affect nuclear safety.
- 3) Review of all proposed changes to the Technical Specifications.
- 4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- 5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence;
- 6) Review of facility operations to detect potential safety hazards.
- 7) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Offsite Review and Investigative Function.
- 8) Review of the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the ~~AMP~~ Quality Programs and Assessment in lieu of distribution in accordance with Specification 6.1.G.2.c(1).
- 9) Review of the Emergency Plan and station implementing procedures and identification of recommended changes;
- 10) Review of reportable events and actions taken to prevent recurrence.
- 11) Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence;
- 12) Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

GENERAL MANAGER

ADMINISTRATION CONTROLS

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation, and administrative procedures relating to facility operations and shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President BWR Operations and the Superintendent of the Offsite Review and Investigative Function.

c. Records

- 1) Reports, reviews, investigations, and recommendations prepared and performed for Specification 6.1.G.2a, shall be documented with copies to the Vice President BWR Operations, the Superintendent of the Offsite Review and Investigative Function, the Station Manager and the ~~Manager of Quality Assurance~~. GENERAL MANAGER QUALITY PROGRAMS AND ASSESSMENT
- 2) Copies of all records and documentation shall be kept on file at the station.

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative Function. These procedures shall include the following:

- 1) Content and method of submission and presentation to the Station Manager, Vice President BWR Operations and the Superintendent of the Offsite Review and Investigative Function.
- 2) Use of committees.
- 3) Review and approval.
- 4) Detailed listing of items to be reviewed.
- 5) Procedures for administration of the quality control activities.
- 6) Assignment of responsibilities.

e. Personnel

- 1) The personnel performing the Onsite Review and Investigative Function, in addition to the Station Manager, shall consist of persons having expertise in:
 - a) nuclear power plant technology,
 - b) reactor operations,
 - c) reactor engineering,
 - d) radiological safety and chemist,
 - e) Instrumentation and control, and
 - f) mechanical and electric systems.

INSERT A

- i. Both channels of each trip system may be placed in an inoperable status for up to 4 hours for required reactor building ventilation system corrective maintenance, filter changes, damper cycling and surveillance tests, other than Surveillance Requirement 4.6.5.1.c, without placing the trip system in the tripped condition..
- j. Both channels of each trip system may be placed in an inoperable status for up to 12 hours for performance of Surveillance Requirement 4.6.5.1.c without placing the trip system in the tripped condition.

INSERT B

Both channels of each trip system for the main steam tunnel ambient temperature and ventilation system differential temperature may be placed in an inoperable status for up to 4 hours for required reactor building ventilation system maintenance and testing and 12 hours for the required secondary containment Leak Rate test without placing the trip system in the tripped condition. This will allow for maintaining the reliability of the ventilation system and secondary containment.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

The proposed Operating License/Technical Specification Amendment has been evaluated to determine whether or not there is a Significant Hazards Consideration based on the questions provided by 10 CFR 50.92 requirements. In addition, the evaluation was measured against the criteria used to establish safety limits, the limiting safety system settings, and the limiting conditions for operations. The results of the evaluation determined that the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed change does not result in a significant increase in the probability or consequences of accidents previously evaluated. The changes are administrative in nature, and as such are not considered in any FSAR Chapter 15 analysis. The changes do not effect any administrative process which could impact the assumptions or results of the analyses.

The proposed change does not create the possibility for a new or different kind of accident from any accident previously evaluated. The proposed changes do not result in the introduction of any new or different equipment, and they will not cause the operation of installed equipment in a new or different manner. The changes will not result in the introduction of any new procedure or process which could create a new or different kind of accident.

The proposed change does not involve a significant reduction in margin of safety. Because the changes are purely administrative in nature, no margin of safety is affected.

Conclusion

Guidance has been provided in 51.44 FR 7744 for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not likely considered to involve significant hazards considerations.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10 CFR 51.22 (c)(10). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50. This change is administrative in nature, involves no significant hazards consideration and results in no significant increase in individual or cumulative occupational radiation exposure.

ZNLD654/14