**Commonwealth Edison**
1400 Opus Place
Downers Grove, Illinois 60515

June 13, 1994

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Application for Amendment to Facility Operating Licenses:

Byron Station Units 1 and 2
NPF-37/66; NRC Docket Nos. 50-454/455
Braidwood Station Units 1 and 2
NPF-72/77; NRC Docket Nos. 50-456/457

"Administrative Changes"

Dear Mr. Russell.

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (ComEd) proposes to amend Technical Specifications of Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77. The subject amendment request proposes to revise Section 6, "Administrative Controls", addressing (1) the submittal frequency of the Radiological Effluent Release Report, (2) the Shift Technical Advisor description, (3) clarification of the Shift Engineer's responsibilities, and (4) other editorial changes to improve readability and consistency with station procedures.

A detailed description of all proposed significant changes is presented in Attachment A. The site specific revised Technical Specification pages are contained in Attachment B.

The proposed changes have been reviewed and approved by the applicable station On-site Review Committee and the Off-site Review Committee in accordance with ComEd procedures. ComEd has reviewed this proposed amendment in accordance with 10 CFR 50.92(c) and has determined that no significant hazards consideration exists as documented in Attachment C. An Environmental Assessment has been completed and is contained in Attachment D.



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ComEd is notifying the State of Illinois of our application for these amendments by transmitting a copy of this letter and the associated attachments to the designated State Official.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other ComEd employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Please address any comments or questions regarding this matter to this office.

OFFICIAL SEAL
MARY JO YACK
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 11/29/97

Respectfully,

Joseph A. Bauer

Joseph A. Bauer
Nuclear Licensing Administrator

Mary Jo Yack 6-13-94

JAB/gp

Attachments

cc: G. F. Dick, Byron Project Manager - NRR
R. R. Assa, Braidwood Project Manager - NRR
H. Peterson, Senior Resident Inspector - Byron
S. G. Dupont, Senior Resident Inspector - Braidwood
B. Clayton, Branch Chief - Region III
Office of Nuclear Facility Safety - IDNS

## ATTACHMENT A

## DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES

### Description of the Proposed Changes

Commonwealth Edison Company (ComEd) proposes to revise Section 6, Administrative Controls, of Technical Specifications for Byron and Braidwood stations. The proposed changes include (1) a change to the submittal frequency of the Radiological Effluent Release Report, (2) a revision to the Shift Technical Advisor description, (3) clarification of the Shift Engineer's responsibilities, and (4) editorial changes.

The marked up Technical Specification pages for each station indicating the proposed changes are provided in Attachment B. A discussion of each proposed change is given below.

1. **Proposed Change to Submittal Frequency of Radiological Effluent Release Report**

   #### Description and Bases of the Current Requirement

   The Radiological Effluent Release Report is submitted semiannually based on the requirements of 10CFR50.36a (prior to August 31, 1992).

   #### Description and Bases of the Requested Revision

   Commonwealth Edison proposes to reduce the requirements for the submission of the Radiological Effluent Release Report from semiannual to annual for Byron and Braidwood. This change affects the index, and Technical Specifications 1.18, 3.11.1.4, 3.11.2.6, 6.9.1.7, and 6.14.1. This change is consistent with the final rule for reducing the regulatory burden on nuclear licensees that was published in the Federal Register on August 31, 1992. The rule change included a revision to 10CFR50.36a regarding the frequency for submitting radiological effluent reports. This change is also consistent with the guidance provided in Draft Generic Letter, "Guidance for Modification of Technical Specifications to Reflect Revisions to ... 10CFR50.36a..."

   #### Impact of the Proposed Change

   This change is administrative in nature and makes the Technical Specifications consistent with the amended requirement of 10CFR50.36a and the draft generic letter. The change does not adversely impact the ability to meet applicable regulatory requirements related to liquid and gaseous effluents. The proposed change will eliminate an unnecessary administrative burden without reducing the protection of the public health and safety.

2. **Proposed Change to the Shift Technical Advisor Description**

**Description and Bases of the Current Requirement**

Technical Specification 6.2.4 describes the purpose of the Shift Technical Advisor (STA) and how capability for performance of STA functions is assured. The Station Control Room Engineer may serve as the STA during abnormal operating or accident conditions.

**Description and Bases of the Requested Revision**

The proposed change deletes redundant/unnecessary text in Technical Specification 6.2.4 except for the description of the STA function. The deleted text addresses the interface of the STA with other control room personnel. The deleted material is currently controlled in station administrative procedures and the UFSAR, and is not required in the Technical Specifications to meet regulatory requirements. The STA qualifications are specified in footnote (c) of Table 6.2-1. The proposed change is consistent with the STA description in the Standard Technical Specifications for Westinghouse Plants (NUREG 1431).

**Impact of the Proposed Change**

The proposed change allows for the flexibility of multiple shift crew configurations and is consistent with the Standard Technical Specifications. The current interpretation of the STA Technical Specification requirements is that the SCRE is the only position that may function as the STA. The proposed change will allow any on-shift SRO, who meets STA qualifications, to perform the STA duties. The STA requirements of NUREG-0660, Action Item I.A.1.1, as clarified by NUREG-0737, remain satisfied. If an on-shift individual holding a Senior Reactor Operator license is filling the STA position, relief from licensed duties and assumption of the STA function is governed by station administrative procedures.

3. **Proposed Clarification of the Shift Engineer's Responsibilities**

**Description and Bases of the Current Requirement**

Technical Specification 6.1.2 states that the Shift Engineer shall be responsible for the control room command function and requires that a management directive to this effect, signed by a company executive, be issued to all station personnel on an annual basis. The Specification also requires that a designated individual shall maintain control room command during the Shift Engineer's absence from the control room.

Description and Bases of the Requested Revision

The proposed change specifies that the Shift Engineer is responsible for **directing** the control room command function and the daily operations of the facility. The issue of transferring control of the command and control function during the Shift Engineer's absence is addressed by footnote (f) of Table 6.2-1. The proposed change is made to more clearly define the responsibilities of the Shift Engineer.

The requirement to issue the annual management directive that describes control room command is deleted from the Technical Specifications. This change eliminates an unnecessary administrative requirement that has no effect on safe operation of the plant.

Impact of the Proposed Change

The Shift Engineer is responsible for the safe overall operation of the facility at all times, regardless of his physical location in the plant. This responsibility is more inclusive than the control room command function. Stating that the Shift Engineer is responsible for the control room command function implies that the majority of the shift is spent in the control room, which is usually not the case. At Byron and Braidwood, the Shift Engineer's office is located adjacent to, but not within, the control room envelope. The responsibility for the control room command function is delineated in footnote (f) of Table 6.2-1. An on-shift SRO, assigned to the control room, will normally be responsible for the control room command function.

Deleting the requirement to issue an annual management directive signed by an executive restating the responsibility of the Shift Engineer, removes an unnecessary administrative burden and has no effect on the safe operation of the facility. The Shift Engineer's responsibilities are described in approved station administrative procedures.

4. **Proposed Editorial Changes**

Description and Bases of the Requested Revisions

Table 6.2-1 is reformatted to more closely match the minimum shift crew composition table provided in Standard Technical Specifications. The table includes more generic titles such as SRO and STA. Throughout Section 6, the titles of "licensed operator" and "senior operator" are changed to "licensed reactor operator" and "senior reactor operator" to reflect current terminology.

Section 6 uses the term "unit" to mean "Unit 1 and Unit 2." In these cases, "unit" is changed to "facility" for clarity. For example, the Shift Engineer function applies to both units, therefore, the word "facility" is used.

In Specification 6.3, the specific titles of Health Physics Supervisor and Lead Health Physicist are replaced by a more generic description of the person who fulfills the position of the Radiation Protection Manager. Using a non-specific title will avoid the need to burden the NRC Staff with another Technical Specification amendment should organizational changes occur in the future.

Specification 6.8.3 contains a typographical error in the word "Specification." The proposed change corrects this error. The last sentence in Specification 6.9.1.4 is deleted since the initial annual reports have already been submitted for each station and the information is no longer required.

**Impact of the Proposed Change**

The proposed changes are editorial/administrative in nature, and do not reduce the requirements of any Technical Specification. They improve readability and provide consistency with station procedures and company programs.

**Schedule Requirements**

There are no specific schedule requirements.

**Identification and discussion of any irreversible consequences**

There were no irreversible consequences identified.

## ATTACHMENT B-1

## PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS, OF FACILITY OPERATING LICENSES NPF-37 AND NPF-66, BYRON STATION UNITS 1 & 2

Revision to:

XIX
XX
1-4
3/4 11-1
3/4 11-3
6-1
6-2
6-2a
6-5
6-6
6-17
6-20
6-22
6-24
6-27

## CHANGE SUMMARY

| Technical Specification | Change Description | Described in item # |
|---|---|---|
| Index | Change "unit" to "facility" | 4 |
| Index | Change "Semiannual" to "Annual" | 1 |
| 1.18 | Delete "Semiannual" | 1 |
| 3.11.1.4 | Delete "Semiannual" | 1 |
| 3.11.2.6.a | Delete "Semiannual" | 1 |
| 6.1.1 | Change "unit" to "facility" | 4 |
| 6.1.2 | Revise description of the Shift Engineer's responsibilities | 3 |
| 6.2.1 | Change "unit" to "facility" | 4 |
| 6.2.2 | Change "unit" to "facility"<br>Change "Operator" to "Reactor Operator" | 4 |
| 6.2.4 | Revise description of Shift Technical Advisor;<br>Delete description of specific STA work practices | 2 |
| Table 6.2-1 | Replace table with one that is more consistent with the Standard Technical Specifications (titles, notes, and format) | 4 |
| 6.3 | Change "unit" to "facility"<br>Replace specific titles with more generic titles | 4 |
| 6.4 | Change "unit" to "facility" | 4 |
| 6.8.3 | Correct spelling of "Specification" | 4 |
| 6.8.3.b | Change "Operator" to "Reactor Operator" | 4 |

## CHANGE SUMMARY (continued)

| Technical Specification | Change Description | Described in item # |
|---|---|---|
| 6.9.1.4 | Change "unit" to "facility"<br>Delete reference to initial report | 4 |
| 6.9.1.6 | Change "unit" to "facility" | 4 |
| 6.9.1.7 | Change the submittal frequency of the radiological effluent report from semiannual to annual. Due date changed to May 1. | 1 |
| 6.9.10.2 | Change "unit" to "facility" | 4 |
| 6.14.1.c | Delete "Semiannual" | 1 |