



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 7, 1994

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Supplement to Application for Amendment to Facility Operating Licenses
- Administrative Changes

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

Reference: J. A. Bauer letter to W. T. Russell transmitting request to amend
Technical Specification Section 6, dated June 13, 1994

The referenced letter transmitted Commonwealth Edison Company's (ComEd) request to amend Technical Specification Section 6, "Administrative Controls." The proposed changes address the submittal frequency of the Radiological Effluent Release Report, the Shift Technical Advisor description, clarification of the Shift Engineer's responsibilities, and editorial changes to improve readability and consistency with station procedures.

Through discussions with the Nuclear Regulatory Commission (NRC) ComEd agreed to revise the proposed text of Specification 6.3.1 to more clearly define who is designated as the Radiation Protection Manager. The attached supplemental change contains that change.

Attachment A contains a description and safety analysis of the proposed supplemental change. Attachment B contains the supplemental changes to the proposed revision to the Technical Specifications for Byron and Braidwood Stations.

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Attachment C "Evaluation of Significant Hazards Considerations," Attachment D "Environmental Assessment," and Attachment E "Change Summary", which were submitted with referenced letter, remains unchanged, and therefore are not included with this transmittal.

The proposed changes have been reviewed and approved by the On-site and Off-site Review Committees in accordance with ComEd procedures. ComEd has reviewed this proposed amendment in accordance with 10 CFR 50.92(c) and determined that no significant hazards consideration exists.

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.

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

Sincerely,



Denise M. Saccomando
Nuclear Licensing Administrator

Attachments

cc: G. Dick, Byron Project Manager - NRR
R. Assa, Braidwood Project Manager - NRR
H. Peterson, Senior Resident Inspector - Byron
S. 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 Change

This attachment describes supplemental changes made in support of an amendment request transmitted to the NRC in a J. A. Bauer letter to W. T. Russell dated June 13, 1994. That request proposed several changes to Section 6, Administrative Controls. The original request has a complete description and safety discussion of those changes. This supplement is providing changes based on comments from the NRC during their review of the original amendment request. The complete amendment request includes the original submittal and this supplement. A marked up copy of the Technical Specification page that is affected by this supplement is included in Attachment B of this submittal.

Description and Bases of the Current Requirement

Technical Specification 6.3.1 requires the Health Physics Supervisor or Lead Health Physicist to meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The requirement ensures that the Radiation Protection Manager possesses the requisite knowledge and skills for the position.

Description and Bases of the Requested Revision

Commonwealth Edison proposes to revise Technical Specification 6.3.1 to remove the specific titles of Health Physics Supervisor and Lead Health Physicist and replace them with more generic descriptions of personnel who fulfill the position of the Radiation Protection Manager. Specifically, the designated senior health physics supervisor or lead health physicist may fulfill the function; actual personnel titles may be different.

Impact of the Proposed Change

The proposed change is administrative in nature, and does not reduce the requirements of any Technical Specification. It provides consistency with station procedures and company programs. Personnel who are designated as Radiation Protection Managers continue to meet the qualifications in Regulatory Guide 1.8, September 1975. Deleting specific titles and replacing them with more generic descriptions eliminates future changes in the event that the position titles change.

The proposed change ensures that only the appropriate personnel are designated as Radiation Protection Managers. Thus this proposed change has no negative impact on any system or operating mode.

The marked up page also shows a changes to Specifications 6.2.4 and 6.4.1. These changes are described in detail in the original amendment request dated June 13. The new page supersedes the corresponding page in the original request.

Schedule Requirements

There are no specific schedule requirements.

Identification and Discussion of Irreversible Consequences

There were no irreversible consequences identified.