

## ADMINISTRATIVE CONTROLS

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### UNIT STAFF (Continued)

- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., licensed Senior Operators, licensed Operators, health physics personnel, equipment operators, and key maintenance personnel.

The amount of overtime worked by Unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

### 6.2.3 ONSITE NUCLEAR SAFETY GROUP (ONSG)

#### FUNCTION

6.2.3.1 The ONSG serves as an independent safety engineering group and shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The ONSG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Manager of Nuclear Safety, and the Station Manager, Byron Station.

#### COMPOSITION

6.2.3.2 The ONSG shall be composed of at least ~~four~~<sup>three</sup> dedicated, full-time engineers located on site.

#### RESPONSIBILITIES

6.2.3.3 The ONSG shall be responsible for maintaining surveillance of plant activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### RECORDS

6.2.3.4 Records of activities performed by the ONSG shall be prepared, maintained, and forwarded each calendar month to the Manager of Nuclear Safety, and the Station Manager, Byron Station.

### 6.2.4 SHIFT TECHNICAL ADVISOR

The Station Control Room Engineer (SCRE) may serve as the Shift Technical Advisor (STA) during abnormal operating or accident conditions. During these conditions the SCRE or other on duty STA 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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\*Not responsible for sign-off function.

## ATTACHMENT B

Following the accident at Three Mile Island Unit 2, the NRC Staff developed the Action Plan, NUREG-0660, to provide a comprehensive and integrated plan to improve safety at power reactors. In November, 1980 a set of TMI related actions from NUREG-0660, which were approved for implementation by the Commission, were published in the document NUREG-0737. Included in this NUREG was Item I.B.1.2 - Independent Safety Engineering Group (ISEG). Under the heading of "Position", the following requirements for the ISEG were provided:

"The principal function of the ISEG is to examine plant operating characteristics, NRC issuances, Licensing Information Service advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG is to perform independent review and audits of plant activities including maintenance, modifications, operational problems, and operational analysis and aid in the establishment of programmatic requirements for plant activities."

"Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable. ISEG will then be in a position to advise utility management on the overall quality and safety of operations."

In NUREG-0800 Item II.3.6., it is further stated that "That group shall be comprised of a minimum of five dedicated, full-time engineers, located onsite, but reporting offsite to a corporate official who holds a high-level, technically oriented position who is not in the management chain for power production. For utilities with multiple sites, it may be possible to perform portions of the independent safety assessment function in a centralized location for all the utility's plants. In such cases, on Onsite Group still is required, but it may be slightly smaller than would be the case if it were performing the entire independent safety assessment."

The requirement for establishing an ISEG was applied only to applicants for operating licenses. Therefore, LaSalle County Station was the first Edison station to have an ISEG followed closely by Byron and Braidwood. The size of the ISEG at each of these three stations consists of four full-time engineers. These groups are administered by the Manager of Nuclear Safety who is located in the Company corporate offices. The Manager of Nuclear Safety reports directly to the Chairman and Chief Executive Officer. Three stations, Zion, Dresden and Quad-Cities, do not have an ISEG.

Commonwealth Edison's nuclear program is large; there are six, two-unit nuclear stations. The completion of Braidwood Unit 2 marks the end of the construction program in the nuclear division. In June of 1987, there was a major reorganization of the nuclear operations area at the corporate level. Also, a Strategic Plan for Excellence in Nuclear Operations was

created to integrate the goals and action plans of all departments within the Nuclear Operations area to achieve excellence. To achieve the goals of the Strategic Plan, the reorganization had to embody strong central control and direction at the corporate level.

The new organization includes two major station support groups: The first is Licensing and Plant Support Services and the second is Training, Fuel and Administrative Services. These two groups are each headed by Assistant Vice Presidents who report directly to the Senior Vice President and are independent of plant operations. Some of the responsibilities and functions of those two groups now duplicate the efforts of the ISEG. The new corporate support groups interface with six stations, whereas the ISEG only covers three stations. The Licensing and Plant Support Services Group (LPSSG) now has responsibility for performance assessment of the six stations. They monitor station performance utilizing data trending and assessing work procedures and work practices. Among other things, they assess appropriateness of station programs in meeting regulations, standards and guidelines. In addition, they apprise station and corporate management of performance problems including identification of underlying causes and timely resolution to problems. Another function of the LPSSG is the implementation of the Operation Experience Assessment Program which includes the coordinated development of corrective actions which are uniform across the six stations.

At the station level, the Onsite Regulatory Assurance Department is under the functional control of the Nuclear Licensing Department which is in the LPSSG. This control provides consistency in the review of NRC licensing, inspection and enforcement correspondence, the tracking of commitments and evaluation of NRC policies and regulations and their impact on the operating stations.

Another department that impacts on the functions of ISEG is the operational section of the Onsite Quality Assurance Group. Like the Department of Nuclear Safety, the Quality Assurance Department is entirely independent of the Nuclear Operations area. The operational section of the Onsite Quality Assurance Group at each of the six stations has one to two people licensed at the SRO level. With their knowledge of plant systems and the technical specifications they are able to perform a knowledgeable independent review and assessment of plant operations.

Since the ISEG is part of the technical specifications, the Quality Assurance Department conducts periodic audits of the ISEG to determine if they are in compliance with the requirements of the applicable section of the technical specifications.

The technical specification required functions of the ISEG are not changed by this proposed amendment. Those review items listed in Technical Specification 6.2.3.1 will continue to be reviewed by the ISEG, however, the ISEG will make further use of the corporate level independent review work in performing onsite reviews.

Based on the above information, it has been concluded that ISEG size could be reduced from four to three people without any loss in meeting the requirements of the technical specifications. Using the material developed by all these other support groups in the Nuclear Operations area as a base, the ISEG can perform their functions in a more effective manner with a lower investment in manhours, and hence fewer people. The option for a lower number of personnel is permitted under NUREG-0800.

## ATTACHMENT C

### Evaluation of Significant Hazards Consideration

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the 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 purpose of this amendment is to reduce the Onsite Nuclear Safety Group minimum staffing requirement from four engineers to three engineers. The proposed amendment will have no effect on the consequences of an accident previously evaluated because it will not involve any physical change in the plant or operating procedures. The proposed amendment may have some effect on the probability of an accident previously evaluated since there will be fewer people performing the independent safety assessment function within the Onsite Nuclear Safety Group (ONSG). However, any increase in this probability will not be significant and will be compensated for by the activities of several new corporate level groups (created by recent corporate organization changes) that are independent of the immediate management chain for power production. These groups now perform independent assessments of operating characteristics and safety issues that are often redundant to the technical specification responsibilities of the ONSG. This proposed amendment does not change ONSG areas of review as described in the technical specifications. The ONSG retains responsibility for review of those items listed in Technical Specification 6.2.3.1, but will make additional use of the independent review work done by the above noted corporate level groups.

There will be no change in the physical plant or in the way the plant is operated. No new accidents are postulated. As a result, operation of the plant in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment will not involve any physical change in the margin of safety because there will be no physical change in the plant or change in operation of the plant. There may be some effect on the margin of safety in terms of the amount of review of operating characteristics and safety issues, but this change will not be significant due to the

independent assessment activities of recently created corporate level groups. These groups now have responsibilities that often overlap the technical specification responsibilities of the ONSG. When performing their onsite reviews, the ONSG will increase their use of corporate level independent review work performed by new departments.

Based on the preceding discussion, Commonwealth Edison believes this proposed amendment involves no significant hazards consideration.

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