



Commonwealth Edison

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April 21, 1988

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC. 20555

Subject: Byron Station Units 1 and 2
Application for Amendment to Facility
Operating Licenses NPF-37 and NPF-66,
Appendix A, Technical Specifications
NRC Docket Nos. 50-454 and 50-455

Reference (a): March 10, 1988 letter from K.A. Ainger to U.S. NRC

Gentlemen:

This letter provides additional information to facilitate the NRC's review of an application for a license amendment contained in reference (a). The purpose of the amendment is to reduce the Onsite Nuclear Safety Group minimum staffing requirements from four engineers to three engineers. During a conference call between Commonwealth Edison and the NRC staff on April 11, 1988, the NRC requested additional information regarding: 1) the function of the Safety Engineering Support Group in the Nuclear Safety Department, 2) the independence of the Licensing and Plant Support Services Group from operations, and 3) how the Onsite Nuclear Safety Group uses data and reports generated by other departments. The enclosure to this letter contains the requested information.

Please direct any further questions regarding this matter to this office.

Very truly yours,

K. A. Ainger
Nuclear Licensing Administrator

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cc: Byron Resident Inspector
NRC Region III Office

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ENCLOSURE

The Department of Nuclear Safety is organized as follows. Heading the department is the Manager of Nuclear Safety, who reports directly to the Chairman of Commonwealth Edison. Therefore, this department is completely independent of the production area of the Company. Reporting to the Manager of Nuclear Safety are the Superintendent of Offsite Review and Investigative Function and the Superintendent of Safety Engineering.

The Superintendent of the Offsite Review and Investigative Function fills the requirement of the technical specifications concerning the offsite review function for the six operating stations. Personnel in this offsite review group are located in the corporate offices. The organization of the offsite review committee for each of the nuclear stations has a senior participant acting as chairman who directs the review of the appropriate subject matter, supplemented by other Edison or non-Edison personnel, to meet specific areas of expertise needed for the review.

The Superintendent of Safety Engineering is responsible for the Onsite Nuclear Safety Group (ONSG) at Byron, Braidwood and LaSalle, and a two-man Safety Engineering Support Group at the corporate offices (refer to attached chart). Each ONSG is headed by a site supervisor who is responsible for the functioning of his group. The function of the Safety Engineering Support Group is to assist the ONSG by supplementing the manpower requirements during special safety studies and to act as liaison between the ONSG and other Edison departments to obtain information necessary for the work performed by the ONSG. Although we believe the proposed reduction in the staffing of the ONSG at Byron will not create a manpower shortage for the required duties of this group, the corporate Safety Engineering Support Group will be available whenever needed to augment the ONSG.

Attachment B of reference (a) discussed the major reorganization of Commonwealth Edison's nuclear division in June, 1987. The position of Senior Vice President of Nuclear Operations was created, reporting to the President of Commonwealth Edison. Reporting to the Senior Vice President is a Vice President for PWR operations, a Vice President for BWR operations, an Assistant Vice President for Training, Nuclear Fuel and Administrative Services, and an Assistant Vice President for Licensing and Plant Support Services Group (LPSSG).

The reporting and responsibility of the LPSSG in the nuclear division is structured to provide independence from the two operations Vice Presidents. The charter of the LPSSG requires that they monitor station performance, conduct technical activities assessments, coordinate off-normal performance event investigations, implement regulatory performance improvement programs, trend regulatory performance parameters, and assure that the operating experience from within and outside Commonwealth Edison is assessed and lessons learned are factored into the Company's plant operations. The functions of the LPSSG cover all six Edison stations. Personnel performing the regulatory assurance duties related to the LPSSG are located both at each nuclear station and at the corporate offices. Personnel in the corporate offices interface with each of the six stations and other Commonwealth Edison departments in the performance of their work.

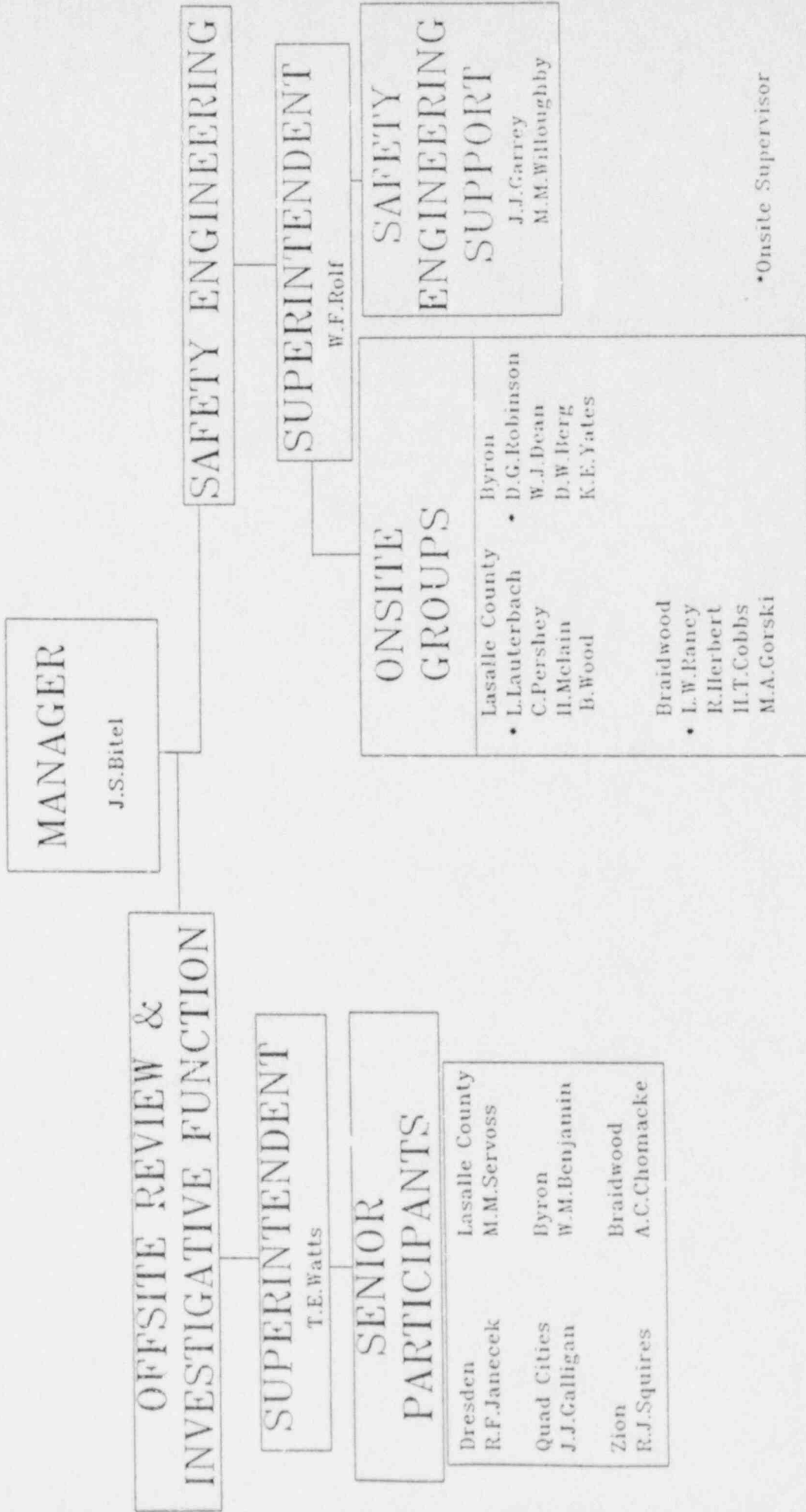
The LPSSG operation has had the biggest impact on the functions of the ONSG. As the LPSSG developed their procedures and reports over the past year, it became apparent that there was a great deal of overlap on reporting between the ONSG and the various sections within the LPSSG. The Department of Nuclear Safety and LPSSG are in the process of reviewing the whole area of data gathering, types of reports generated and how the reports are to be used by the stations.

The Onsite Quality Assurance Groups, which are independent of the production function, perform audits and surveillances of various station activities. The data and reports which are generated from their audits and surveillances are used by the ONSG to detect possible safety issues. The Quality Assurance Department is also able to assemble a great deal of historical information on an area under study from past audits and surveillances. This information is also available to the ONSG.

The duplication of effort and overlapping reviews between the ONSG, LPSSG, and Quality Assurance Department are the bases for the reduction in size of the ONSG. The purpose of the ONSG is to take a stand-back, dispassionate look at the area of nuclear safety in plant operations and make recommendations for improvements. This mission can be accomplished more efficiently by making use of the data and reports generated by the LPSSG and Quality Assurance Department.

In summary, Commonwealth Edison believes the proposed reduction in staffing the Byron ONSG will not diminish the group's ability to perform its independent safety assessment function. The corporate Safety Engineering Support Group is available to augment the ONSG when needed. Additionally, Commonwealth Edison has strengthened the overview and assessment areas of nuclear plant operations in the past year. The Department of Nuclear Safety, Quality Assurance Department and LPSSG have developed a close working relationship and, yet, are not comprising their need for independent action. This working relationship is largely through the sharing of basic data used in the development of each of the three departments' reports. This in turn will permit the most efficient and optimal use of manpower in each department.

DEPARTMENT OF NUCLEAR SAFETY



*Onsite Supervisor