



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 19 TO FACILITY OPERATING LICENSE

NOs. NPF-37 AND NPF-66

BYRON STATION UNITS 1 AND 2

DOCKET NOs. 50-454 AND 50-455

1.0 INTRODUCTION

By letter dated March 10, 1988, and supplemented by letter dated April 21, 1988, Commonwealth Edison Company (CECo), the licensee, submitted a proposed amendment to the Facility Operating Licenses NPF-37 and NPF-66, for Byron Station, Units 1 and 2. The proposed amendment requests a change to Technical Specification (TS) 6.2.3.2 to reduce the composition of the Onsite Nuclear Safety Group from four members to three members.

2.0 DISCUSSION

The Onsite Nuclear Safety Group (ONSG) performs the functions defined in NUREG-0737, Item I.B.1.2 - Independent Safety Engineering Group (ISEG). This item was developed by the NRC staff as part of the Action Plan which was issued after the accident at Three Mile Island Unit 2 to improve safety at power reactors. As stated in NUREG-0737, Item 1.B.1.2:

"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, Section 13.4, Item II.3.b., 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, an 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." For example, the ISEG for TVA's Sequoyah plants has been authorized by the NRC to be composed of three members, the same number proposed for Byron.

CECo has two additional organizations which perform an independent review and audit function. The Onsite Quality Assurance Group performs audits and surveillances of various production activities and are independent of the production function. The Licensing and Plant Support Services Group (LPSSG) reports to the Senior Vice President of Nuclear Operations as does the Vice President for PWR operations. This LPSSG has both onsite and offsite elements which monitor station performance, conduct technical assessments, coordinate off-normal event investigations and implement regulatory performance improvement and trending programs. The information obtained by these two groups is shared with ONSG and is utilized by the ONSG in performing its review and audit functions.

Thus, many of the functions that NUREG-0737, Item I.B.1.2, requires of the ONSG are being done by the Onsite Quality Assurance Group and the LPSSG. The mission of the ONSG can be accomplished more efficiently by using the data and reports generated by these other two groups. Based on this, and based on the licensee's ability to supplement the ONSG personnel with engineering personnel from the corporate nuclear safety staff, the NRC staff concludes that reducing the ONSG to three members is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The staff has further concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of this amendment will not be inimical to the common defense and security or the health and safety of the public.

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Dated: July 1, 1988