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An Exelon/British Energy Company

AmerGen Energy Company, LLC
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US Route 9 South
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10 CFR 50.90

June 7, 2001
2130-01-20097

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

Subject: Oyster Creek Generating Station (OCGS)
Docket No. 50-219
Facility License No. DPR-16
Technical Specification Change Request No. 297

In accordance with 10 CFR 50.90, AmerGen Energy Company, LLC (AmerGen) requests NRC review and approval of a proposed change to the Appendix A Technical Specifications contained on page 6-2a. The change described in Enclosure 1 would revise the requirement for the Senior Manager - Operations to hold a Senior Reactor Operator (SRO) license. The proposed change is consistent with the Improved Standard Technical Specifications (NUREG-1433) and would allow the Senior Manager - Operations or an Operations Manager to hold an SRO license. The Technical Specification mark-up is contained in Enclosure 2. A replacement page will be provided to the NRC prior to issuance of the license amendment authorizing the change. NRC approval of the proposed change is requested by June 8, 2002.

Using the standards in 10 CFR 50.92, AmerGen has concluded that the proposed change does not constitute a significant hazard as described in the Enclosure 1 analysis performed in accordance with 10 CFR 50.91 (a)(1).

AmerGen believes that an environmental review of this change is not required in accordance with the criteria of 10 CFR 51.22 (c)(9). The proposed change does not involve a significant hazard, pertains only to an administrative requirement that does not effect the amount of effluents released offsite and does not result in an increase in individual or cumulative occupational radiation exposure.

Pursuant to 10 CFR 50.91 (b)(1), also enclosed is the Certificate of Service for this request certifying service to the designated official of the State of New Jersey Bureau of Nuclear Engineering and the Mayor of Lacey Township, Ocean County, New Jersey.

This proposed change to the Technical Specifications has undergone a safety review in accordance with Section 6.5 of the Oyster Creek Technical Specifications.

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Should you have any questions or require any additional information please contact
Mr. George B. Rombold at 610-765-5516.

Very truly yours,



Ron J. DeGregorio
Vice President
Oyster Creek

Enclosures 1) Technical Specification Change Request No. 297
 2) Technical Specification Page 6-2a Mark-up

c: H. J. Miller, Administrator, USNRC Region I
L. A. Dudes, USNRC Senior Resident Inspector, Oyster Creek
H. N. Pastis, USNRC Senior Project Manager, Oyster Creek
File No. 01053

United States of America
Nuclear Regulatory Commission

In the Matter of)
AmerGen Energy Company, LLC)

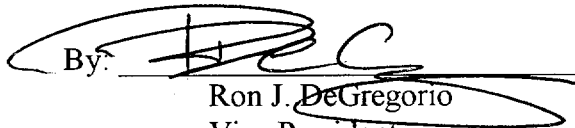
Docket No. 50-219

Certificate of Service

This is to certify that a copy of Technical Specification Change Request No. 297 for the Oyster Creek Generating Station Facility Operating License, filed with the U.S. Nuclear Regulatory Commission on June 7, 2001 has this 7th day of June 2001, been served on the Mayor of Lacey Township, Ocean County, New Jersey, and the designated official of the State of New Jersey Bureau of Nuclear Engineering, by deposit in the United States mail, addressed as follows:

The Honorable Ronald Sterling
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 411
Trenton, NJ 08625

By: 
Ron J. DeGregorio
Vice President
Oyster Creek

Oyster Creek Generating Station

Facility Operating License
No. DPR-16

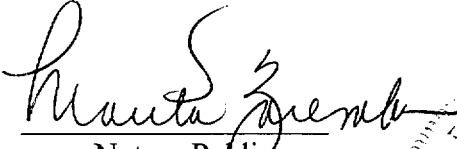
Technical Specification Change
Request No. 297
Docket No. 50-219

Applicant submits by this Technical Specification Change Request No. 297 to the Oyster Creek Generating Station Facility Operating License a change to Specification 6.2.2.2.j. All statements contained in this application have been reviewed, and all such statements made and matters set forth therein are true and correct to the best of my knowledge.

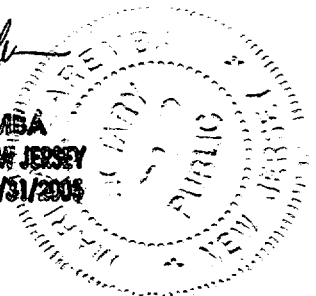
By: 

Ron J. DeGregorio
Vice President
Oyster Creek

Sworn to and subscribed before me this 7th day of June 2001.


Notary Public

MARITA ZAREMBA
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 5/31/2005



Enclosure 1

Oyster Creek Generating Station
Technical Specification Change Request No. 297

Safety Evaluation
and
No Significant Hazards Determination

I. Technical Specification Change Request No. 297

The purpose of this Technical Specification Change Request (TSCR) is to revise Oyster Creek Generating Station (OCGS) Technical Specification (TS) 6.2.2.2.j. The proposed change to TS 6.2.2.2.j revises the requirement concerning the Operations management position that must hold an SRO license. At least one of the Operations Managers or the Senior Manager – Operations will be required to meet NRC requirements for maintaining an SRO license.

AmerGen Energy Company, LLC (AmerGen) requests that the following change be made to the existing Appendix A Technical Specifications:

Revision to Current Technical Specification Page: 6-2a

The proposed change is indicated on a mark-up of Technical Specification page 6-2a in Enclosure 2.

II. Reason for Change

This proposed change allows any of the SRO-licensed Operations Managers, who also meet the qualification requirements of ANSI/ANS 3.1 - 1978, as required by TS 6.3.1, to satisfy the current technical specification requirement that the Senior Manager – Operations hold an SRO license. This provides flexibility in filling vacancies and allows the appointment of a Senior Manager - Operations who may not hold an SRO license. Additionally, this would allow the Senior Manager – Operations more time to manage the Operations Department by not being required to participate in Licensed Operator Qualification Training.

III. Safety Evaluation Justifying Change

Currently, TS 6.2.2.2.j requires the Senior Manager – Operations to hold an SRO license. The current Oyster Creek Operations management structure is comprised of the Senior Manager – Operations and two (2) Operations Managers. In order to comply with the requirements of the proposed change to TS 6.2.2.2.j, one of these individuals will be required to hold an SRO license. Therefore, in the event the Senior Manager – Operations does not hold an SRO license, an Operations Manager must hold an SRO license. This individual will be qualified (i.e., ANSI/ANS 3.1 – 1978 as required by TS 6.3.1) to fill the Senior Manager – Operations position and have the same management authority over the licensed operators as the Senior Manager – Operations. This change is consistent with the Improved Standard Technical Specifications (NUREG-1433, Section 5.2.2.e).

IV. No Significant Hazards Determination

In accordance with 10 CFR 50.91 the following provides an analysis that concludes no significant hazards are involved with the proposed change. The standards in 10 CFR 50.92 are used in this determination.

- (1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change to TS 6.2.2.2.j revises the requirement concerning the Operations management position that must hold an SRO license. At least one of the Operations Managers or the Senior Manager – Operations will continue to meet NRC requirements for maintaining an SRO license. The training, qualification and experience requirements for Operations management personnel will continue to satisfy ANSI/ANS 3.1 – 1978 as required by TS 6.3.1. This change does not involve any physical modifications to plant structures, systems, or components (SSC), or the manner in which SSCs are operated, maintained, modified, tested, or inspected. As the proposed change is administrative in nature, operation of the facility in accordance with the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change to TS 6.2.2.2.j revises the requirement concerning the Operations management position that must hold an SRO license. At least one of the Operations Managers or the Senior Manager – Operations will continue to meet NRC requirements for maintaining an SRO license. The training, qualification and experience requirements for Operations management personnel will continue to satisfy ANSI/ANS 3.1 – 1978 as required by TS 6.3.1. This change does not involve any physical modifications to SSCs, or the manner in which SSCs are operated, maintained, modified, tested, or inspected. As the proposed change is administrative in nature, operation of the facility in accordance with the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

The proposed change to TS 6.2.2.2.j revises the requirement concerning the Operations management position that must hold an SRO license. At least one of the Operations Managers or the Senior Manager – Operations will continue to meet NRC requirements for maintaining an SRO license. If the Senior Manager – Operations does not hold an SRO license, then an Operations Manager must hold an SRO license. This individual will be qualified to fill the Senior Manager – Operations position and have the same management authority over licensed operators as the Senior Manager – Operations. In addition, administrative procedures will ensure that there is always an individual holding a current SRO license within Operations management. The training, qualification and experience requirements for Operations management personnel will continue to satisfy ANSI/ANS 3.1 – 1978 as required by TS 6.3.1.

This change does not involve any physical modifications to SSCs, or the manner in which SSCs are operated, maintained, modified, tested, or inspected. As the proposed change is administrative in nature, operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

V. Implementation

AmerGen requests that the amendment authorizing this change be effective upon issuance.

Enclosure 2

Oyster Creek Generating Station
Technical Specification Change Request No. 297

Technical Specification Page 6-2a Mark-up

- c. A break of at least eight hours should be allowed between work period, including shift turnover time.
- d. In a, b, and c above, the time required to complete shift turnover is to be counted as break time and is not to be counted as work time.
- e. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Department Managers, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

- j. The Senior Manager - Operations ^{or an Operations Manager,} and the Shift Manager require Senior Reactor Operators licenses. The licensed Nuclear Plant Operators require a Reactor Operators license.

6.2.2.3 Individuals who train the operating staff and those who carry out the health physics and quality assurance function shall have sufficient organizational freedom to be independent of operational pressures, however, they may report to the appropriate manager on site.

6.3 Facility Staff Qualifications

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. Technicians and maintenance personnel who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are permitted to perform work for which qualification has been demonstrated.
- 6.3.2 The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 (Rev. 1-R, 9/75). Each other member of the radiation protection organization for which there is a comparable position described in ANSI N18.1-1971 shall meet or exceed the minimum qualifications specified therein, or in the case of radiation protection technicians, they shall have at least one year's continuous experience in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations and shall have been certified by the management position responsible for radiological controls as qualified to perform assigned functions. This certification must be based on an NRC approved, documented program consisting of classroom training with appropriate examinations and documented positive findings by responsible supervision that the individual has demonstrated his ability to perform each specified procedure and assigned function with an understanding of its basis and purpose.
- 6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, response and analysis of the plant for transients and accidents.