



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 4, 1998

DOCKETED  
USNRC

'98 AUG -7 P2:00

Board Notification 98-01

OFFICE OF THE  
GENERAL COUNSEL  
RULEMAKING  
ADJUDICATION

MEMORANDUM TO: Atomic Safety and Licensing Board  
and All Parties

FROM: Seymour H. Weiss, Director *Seymour H. Weiss*  
Non-Power Reactors and Decommissioning  
Project Directorate  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: INFORMATION THAT IS POTENTIALLY RELEVANT AND MATERIAL  
TO BOARD PROCEEDING IN THE MATTER OF ZION NUCLEAR  
POWER STATION UNITS 1 AND 2

In conformance with the Commission's policy on notification of the Licensing Board of new, relevant, and material information, this memorandum provides the information discussed below.

The Board has pending before it a petition for leave to intervene concerning the application of Commonwealth Edison Company to amend its operating license for the Zion Nuclear Power Station, Units 1 and 2. The proposed amendment would 1) restore the Zion Custom Technical Specification (CTS) which had been replaced with Improved Technical Specifications by a previous amendment, 2) reinstate License Conditions that were deleted by that previous amendment and, 3) modify Section 6 of the CTS to allow the use of Certified Fuel Handlers to satisfy shift staffing requirements, reduce required shift staffing numbers and on-shift crew composition, change management titles and responsibilities to reflect the Zion's permanently shutdown organization, and alter certain verbiage which may imply that the units are operational.

The staff has made a final no significant hazards consideration determination and informed the Commission concerning the issuance of this amendment. The amendment was then issued on July 24, 1998. A copy of the amendment, safety evaluation and notice of significant licensing action are enclosed.

This information is being brought to the attention of the Licensing Board and all parties and petitioners, as it may be relevant and material to issues pending before the Licensing Board.

Docket Nos. 50-295 and  
50-304

Enclosures: As stated

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19397

BOARD NOTIFICATION DISTRIBUTION LIST

COMMONWEALTH EDISON COMPANY  
(Zion Nuclear Power Station, Units 1 and 2)  
Docket Nos. 50-295/304-LA

BN: 98-01

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Washington, DC 20555

Adjudicatory File (2)  
Atomic Safety and Licensing Board  
Panel  
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Office of the Secretary (2)  
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Mail Stop: O-16/G15  
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Mr. O. Kingsley  
Commonwealth Edison Company

Zion Nuclear Power Station, Units 1 & 2  
Docket Nos. 50-295/304

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OFFICE OF NUCLEAR REACTOR REGULATION

NOTIFICATION OF SIGNIFICANT LICENSING ACTION

LICENSEE: Commonwealth Edison Company  
Zion Nuclear Power Station, Units 1 and 2  
Docket Nos. 50-295, 50-304

SUBJECT: PROPOSED ISSUANCE OF A FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION AND LICENSE AMENDMENT FOR WHICH A HEARING HAS BEEN REQUESTED

This is to inform the Commission that a final no significant hazards consideration determination and license amendment will be issued on or about July 20, 1998, to Commonwealth Edison Company (ComEd). This action is being taken in response to the licensee's amendment application dated March 30, 1998, and will modify License Nos. DPR-39 and DPR-48 for the Zion Nuclear Power Station, Units 1 and 2. The proposed amendments would restore the Zion Custom Technical Specifications (CTS) that had been replaced with Improved Technical Specifications by a previous amendment and would reinstate License Conditions that were deleted by that previous amendment. These proposed amendments would also modify the CTS to allow the use of Certified Fuel Handlers to satisfy shift staffing requirements and would change management titles and responsibilities to reflect the permanently shutdown organization.

A hearing on this license amendment was requested by Mr. Edwin D. Dienethal on June 4, 1998. Any hearing held in response to this request would not be completed prior to issuance of the license amendment.

On June 10, 1998, the Office of the Secretary referred the request for a hearing to the Atomic Safety and Licensing Board Panel (ASLBP). On June 11, 1998, the Chief Administrative Judge of the ASLBP established an Atomic Safety and Licensing Board to preside over the proceeding (63 FR 33097).

On June 17, 1998, the Board issued an Order setting a schedule for submission of answers to the request for a hearing and specifying methods for service. Pursuant to the Board's Order, the applicant's answer is to be filed by July 1, 1998, and the NRC staff's answer is to be filed by July 8, 1998. ComEd filed its answer on July 1, 1998.

The State of Illinois will be notified of the proposed issuance.

Contacts: R. Assa, NRR, 415-1391  
E. Collins, NRR, 415-1270

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Confirmation that amendment was issued and licensee has received

Date amendment issued: July 24, 1998  
Date received by licensee: July 24, 1998

DOCUMENT NAME: G:WSLA9807.13

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July 24, 1998

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. MA1495, MA1496, MA1313 AND MA1314)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 179 to Facility Operating License No. DPR-39 and Amendment No. 166 to Facility Operating License No. DPR-48 for the Zion Nuclear Power Station, Units 1 and 2, respectively. The amendments are in response to your application dated March 30, 1998.

These amendments will (1) restore Custom Technical Specifications (CTS) and the associated license conditions that had been replaced by Improved Technical Specifications (ITS), (2) change certain management titles and responsibilities to reflect the permanently shut down condition of the plant, (3) allow use of Certified Fuel Handlers in lieu of licensed operators, (4) modify shift crew composition, and (5) eliminate verbiage that implies the units are operational.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIG. SIGNED BY  
Ramin R. Assa, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-295, 50-304

Enclosures: 1. Amendment No. 179 to DPR-39  
2. Amendment No. 166 to DPR-48  
3. Safety Evaluation

cc w/encls: See next page

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C. Moore R. Assa D. Hills, RIII  
S. Weiss

DOCUMENT NAME: G:\CMNTSP\ZION\ZI1495.AMD \*concurrence provided by SE dated 05/22/98; no major revisions  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 24, 1998

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
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A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Ramin R. Assa", is located below the "Sincerely," text.

Ramin R. Assa, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-295, 50-304

Enclosures: 1. Amendment No. 179 to DPR-39  
2. Amendment No. 166 to DPR-48  
3. Safety Evaluation

cc w/encs: See next page

O. Kingsley  
Commonwealth Edison Company

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**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**COMMONWEALTH EDISON COMPANY**

**DOCKET NO. 50-295**

**ZION NUCLEAR POWER STATION, UNIT 1**

**AMENDMENT TO FACILITY OPERATING LICENSE**

Amendment No. 179  
License No. DPR-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Commonwealth Edison Company (the licensee) dated March 30, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-39 is hereby amended to read as follows:



(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 179, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Ramin R. Assa, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 24, 1998



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-304

ZION NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 166  
License No. DPR-48

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Commonwealth Edison Company (the licensee) dated March 30, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-48 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 155, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Ramin R. Assa, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: July 24, 1998



ATTACHMENT TO LICENSE AMENDMENT NOS. 179 AND 166

FACILITY OPERATING LICENSE NOS. DPR-39 AND DPR-48

DOCKET NOS. 50-295 AND 50-304

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

Remove Pages

300  
301  
309  
310  
310b  
311  
325  
326  
327

Insert Pages

300  
301  
309  
310  
310b  
311  
325  
326  
327

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 Organization

1. Onsite and offsite organizations shall be established for station and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage and handling of nuclear fuel.
  - a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual.
  - b. The Decommissioning Plant Manager shall be responsible for overall plant safety and shall have control over those onsite activities necessary for safe storage and handling of nuclear fuel.
  - c. A Corporate Vice-President shall have corporate responsibility for the safe handling and storage of nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel.
  - d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to an appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.
2. Deleted.
3. The shift manning for the station shall be as shown in Figure 6.1-1. The Decommissioning Operations Manager and the Shift Supervisor shall be a Certified Fuel Handler. The Decommissioning Plant Manager has responsibility for the Fire Protection Program. The Decommissioning Operations Manager will be responsible for implementation of the Fire Protection Program.
  - a. All fuel handling operations shall be directly supervised by a Certified Fuel Handler.
  - b. Individuals holding a current license as a Senior Reactor Operator are qualified as a Certified Fuel Handler.

(Continued)

- 6.1.4. Qualifications of the Station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception of the Health Physics Supervisor or Lead Health Physicist, who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8, September 1975. The Decommissioning Operations Manager shall meet the requirements of Operations Manager in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception that this individual may be qualified as a Certified Fuel Handler at time of appointment in lieu of holding a Senior Reactor Operator license.
5. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.
6. Retraining shall be conducted at intervals not exceeding two years.
7. A training and retraining program for the Certified Fuel Handler shall be maintained under the direction of the Decommissioning Plant Manager or his designee.



Procedures and Programs

1. Written procedures including applicable checkoff lists covering items listed below shall be prepared, implemented, and maintained:
  - a. The applicable procedures recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978;
  - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Section 7.1 of Generic Letter No. 82-33;
  - c. Station Security Plan implementation;
  - d. Generating Station Emergency Response Plan implementation;
  - e. PROCESS CONTROL PROGRAM implementation;
  - f. OFFSITE DOSE CALCULATION MANUAL implementation;
  - g. Fire Protection Program implementation;
  - h. Post Accident Sampling Program which will ensure the capability to: obtain and analyze reactor coolant and containment atmosphere samples, and collect and analyze or measure radioactive iodine and particulates in plant gaseous effluents under accident conditions. The program shall include the following:
    - (i) Training of personnel,
    - (ii) Procedures for sampling and analysis,
    - (iii) Provisions for maintenance of sampling and analysis equipment.
  - i. Working hours of plant staff who perform functions important to the safe handling and storage of nuclear fuel (e.g., Certified Fuel Handlers, non-certified operators, radiation protection personnel, and key maintenance personnel) such that the heavy use of overtime is not routinely required.

3. Technical Review and Control

Procedures required by Specification 6.2.1 and other procedures which affect nuclear safety, as determined by the Decommissioning Plant Manager and changes thereto, other than editorial or typographical changes, shall be reviewed prior to implementation as follows; except as noted in Specification 6.2.4:

- A. Each procedure or procedure change shall be independently reviewed by a qualified individual who is knowledgeable in the area affected and is not the individual who prepared the procedure or procedure change. This review shall include a determination of whether or not additional cross-disciplinary reviews are necessary. If deemed necessary, the reviews shall be performed by the qualified review personnel of the appropriate discipline(s).
- B. Individuals performing these reviews shall meet the applicable experience requirements of ANSI N18.1 - 1971, sections 4.2 and 4.4 and be approved by the Decommissioning Plant Manager.
- C. Applicable administrative procedures recommended by Regulatory Guide 1.33, Plant Emergency Operating Procedures, and changes thereto shall be submitted to the Onsite Review and Investigative Function for review and approval prior to implementation.
- D. Review of the procedure or procedure change will include a determination of whether or not an unreviewed safety question is involved. This determination will be based on the review of a written safety evaluation prepared by a qualified individual, or documentation that a safety evaluation is not required. Onsite Review, Offsite Review and Commission approval of items involving unreviewed safety questions shall be obtained prior to Station approval for implementation.
- E. The Department Head approval authority shall be as specified in station procedures.
- F. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.5.1.E.

Editorial or typographical changes shall be made in accordance with station procedures.

4. Temporary changes to procedures identified in Specifications 6.2.1 and 6.2.2 above may be made provided:

- A. The intent of the original procedure is not altered.
- B. The change is approved by two members of the plant management staff, at least one of whom is a Certified Fuel Handler.
- C. The change is documented, reviewed and approved in accordance with Specification 6.2.3 within 14 days of implementation.

## 6.2 (Continued)

- 7) Limitations on the dose rate resulting from radioactive materials released in gaseous effluents from the site to areas at or beyond the SITE BOUNDARY shall be limited to the following:
  - a) For noble gases: less than or equal to a dose rate of 500 mrem/yr to the whole body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
  - b) For Iodine-131, Iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

## 8. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

## 6.3 Action to be Taken in the Event of a Reportable Event:

Any Reportable Event shall be promptly reported to the Decommissioning Plant Manager or his designated alternate. The incident shall be promptly reviewed by the Onsite Review and Investigation Function and a separate report for each reportable event shall be prepared in accordance with the requirements of 10 CFR 50.73.



6.4 DELETED

6.5 Plant Operating Records

1. Records relative to the following items shall be retained for at least five years:
  - A. Records of normal plant operation, including power levels and periods of operation at each power level.
  - B. Record of principal maintenance activities, including inspection, repair and replacements, regarding principal items of equipment pertaining to nuclear safety.
  - C. Records and reports of Reportable Events and Safety Limit occurrences.
  - D. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.
  - E. Records of changes made to procedures required by Specifications 6.2.1 and 6.2.2.
  - F. Records of radioactive shipments.
  - G. Records of physics tests and other tests pertaining to nuclear safety.
  - H. Records of sealed source and fission detector leak tests and results.
  - I. Shift Engineers Logs.
  - J. By-product material inventory records.
2. Records relative to the following items shall be retained for the duration of the Operating License:
  - A. Substitution or replacement of principal items of equipment pertaining to nuclear safety.
  - B. Records and drawing changes reflecting plant design modifications made to systems and equipment described in the Safety Analysis Report.

6.7 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.5.2.S. The documentation shall contain:
  - 1) Sufficient information to support the change together with appropriate analyses or evaluations justifying the change(s); and
  - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.
- b. Shall become effective after review and acceptance by the Onsite Review and Investigative Function, and the approval of the Decommissioning Plant Manager on the date specified by the Onsite Review and Investigative Function.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made effective. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.8 Flooding Protection

1. In the event of the possibility of flooding, all doors listed in Table 6.8-1 shall be verified closed.

6.9 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.5.2.S. This documentation shall contain:
  - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the Onsite Review and Investigative Function and the approval of the Decommissioning Plant Manager.



Position	Minimum Crew Number <sup>(a)</sup>
Shift Supervisor	1
Non-certified operator	2
Total <sup>(b)</sup>	3

- (a) The shift crew composition may be one less than the minimum requirements of Figure 6.1-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absences of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within minimum requirements of Figure 6.1-1. This provision does not permit any shift crew position to be unstaffed upon shift change due to an oncoming shift crew member being late or absent.
- (b) At least one person qualified to stand watch in the control room (non-certified operator or Certified Fuel Handler) shall be present in the control room when nuclear fuel is stored in the fuel storage pool.

MINIMUM SHIFT CREW COMPOSITION  
FIGURE 6.1-1



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001**

**SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION**  
**RELATED TO AMENDMENT NO. 179 TO FACILITY OPERATING LICENSE NO. DPR-39**  
**AND AMENDMENT NO. 166 TO FACILITY OPERATING LICENSE NO. DPR-48**  
**COMMONWEALTH EDISON COMPANY**  
**ZION NUCLEAR POWER STATION, UNITS 1 AND 2**  
**DOCKET NOS. 50-295 AND 50-304**

**1.0 INTRODUCTION**

By letter dated March 30, 1998, Commonwealth Edison Company (ComEd, the licensee) submitted a request for an amendment to the Zion Nuclear Power Station (Zion) Technical Specifications (TS). ComEd's application to amend the Zion TSs (1) requests restoration of Custom Technical Specifications (CTS) and the associated license conditions that had been replaced by Improved Technical Specifications (ITS), (2) would change certain management titles and responsibilities to reflect the permanently shut down condition of the plant, (3) would allow use of Certified Fuel Handlers (CFH) in lieu of licensed operators, (4) would modify shift crew composition, and (5) would eliminate verbiage that implies the units are operational. This request was submitted as a result of ComEd's decision to permanently cease operation of the Zion Nuclear Power Station.

**2.0 EVALUATION**

The ITS were approved and issued by Amendment Nos. 178 and 165 on December 19, 1997, but were never implemented at Zion. Therefore, ComEd has continued to conduct activities at Zion in accordance with CTS. The proposed TS amendments would revoke the ITS and maintain CTS as the specifications governing activities at Zion. The amendments would also restore the five license conditions that were deleted from CTS based on (1) approval and implementation of ITS, (2) relocation of four of the license conditions to ITS, and (3) relocation of one license condition to the Updated Final Safety Analysis Report (UFSAR). ComEd intends to submit, at a later date, a new set of Permanently Defueled TSs.

The proposed amendments to the CTS would modify the responsibilities and titles of the Chief Nuclear Officer, the Site Vice President, and the Station Manager. As currently described in Section 6 of CTS, the responsibilities and titles of these individuals are associated with an operational nuclear power generating facility. ComEd intends to transfer responsibility for Zion to the ComEd Decommissioning Projects organization and proposes to change the titles and responsibilities to reflect the permanently shut down condition of the facility. These changes include: transferring corporate responsibility for safe handling and storage of the fuel from the Chief Nuclear Officer to a Corporate Vice-President; eliminating the Site Vice President's position, and changing the Station Manager's title to the Decommissioning Plant Manager. Other changes include: replacing the Shift Operation Supervisor, Shift Engineer, and Shift Foreman



with the Shift Supervisor who would be a Certified Fuel Handler, eliminating the Fuel Handling Foreman's position, and changing the Operating Engineer's title to Decommissioning Operations Manager.

In its permanently defueled condition, licensed operators trained in accordance with the requirements of 10 CFR Part 55 are no longer required at Zion Station. The proposed CTS amendments describe the training and qualification requirements that are appropriate for personnel at a permanently defueled facility. The amendments to the CTS will also allow the use of CFH in lieu of licensed operators.

In its permanently defueled condition, there are fewer tasks to be performed by the operating crews at Zion Station. As such, fewer personnel will be needed to operate the facility. The proposed amendments change the shift crew composition to allow the use of a Shift Supervisor and two non-certified operators rather than 10 CFR Part 55 licensed operators to reflect the permanently shutdown and defueled condition of the facility. The Shift Supervisor would be qualified as a CFH.

There are several areas in Section 6 of CTS which could imply that Zion Station is still operational. Typically, these occur when the term "operating" or "operation" is applied to the terms "unit" or "plant." Rewording of this type of verbiage would avert confusion or misunderstanding.

### 3.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

**Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Zion, Units 1 and 2, are permanently shut down and defueled. All of the fuel is stored in the spent fuel pool. Credible operating accidents are significantly reduced in this mode. Major nuclear activities that may significantly affect public safety are storage and handling of nuclear fuel. Accidents related to these activities have been previously evaluated. The proposed changes do not increase the probability or consequences of an accident previously evaluated for a permanently shut down plant.

On December 19, 1997, the NRC approved Zion's Improved Technical Specifications (ITS). The licensee had 30 days from that date to implement the ITS. However, because ComED decided to shut down Zion on January 15, 1998, the ITS were never implemented. Zion has continued to comply with the requirements of the CTS without any interruption. The proposed amendment revokes the ITS and allows continued use of CTS. Therefore, reinstating the CTS and five License Conditions which were removed by ITS, will not increase the probability or consequences of an accident previously evaluated.

Because Zion is permanently shut down, the scope of work has decreased at the station. Therefore, a change in the management organization was requested to reflect this reduced work scope. For example, there will be no need for shift engineers and licensed operators because the reactors will not be operating. The major nuclear activities would be storage and handling of spent fuel bundles in the pool. The qualification needed for this function can be found in Certified Fuel Handlers. Changing the management organization and utilizing Certified Fuel Handlers will not increase the probability or consequences of an accident previously evaluated.

In the CTS and ITS there are no requirements to have a Shift Control Room Engineer (SCRE) when both units are not operating. Therefore, the elimination of SCRE does not increase the probability or consequences of an accident previously evaluated. Finally, the NRC, in the ITS amendment, had approved the elimination of the Radiation Protection Person (RPP) from the shift when both units were shut down. Elimination of the on shift RPP will not result in an increase in the probability of an accident nor will it increase the consequences of an accident previously evaluated. RPP personnel will remain available to support radiological work activities during decommissioning.

**Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

No new activities will be conducted that were not previously evaluated. The scope of the work has significantly been reduced at Zion because it will not operate again. In addition, the proposed changes do not involve the addition of new components or structures that could create a new or different kind of accident. Restoration of the CTS and the five License Conditions do not introduce a new or different kind of accident because Zion has continued to comply with the requirements of the CTS and the License Conditions even though they were abolished in the ITS. Management changes, shift staffing reductions and the utilization of Certified Fuel Handlers are requested to meet the needs of the current state of the plant, which is permanently shut down. These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

**Does the change involve a significant reduction in a margin of safety?**

Because Zion is shut down and the scope of work has been reduced and most of the work that will be conducted at Zion has been evaluated previously, there is no reduction in the margin of safety. The proposed changes do not introduce any new work that will reduce the margin of safety. The CTS and License Conditions were continuously in effect since prior to issuance of the ITS, therefore, restoration of the CTS and the License Conditions will not reduce the margin of safety. The requested management changes, shift staffing reductions and the utilization of Certified Fuel Handlers are commensurate with the current defueled status of Zion. Therefore, these changes do not reduce the margin of safety.

Based on the analysis above, in accordance with the standards of 10 CFR 50.92(c), the NRC staff has made a final determination that the requested amendments involve no significant hazards consideration.

#### **4.0 STATE CONSULTATION**

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

#### **5.0 ENVIRONMENTAL CONSIDERATION**

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no



significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final no significant hazards finding with respect to the amendments. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 6.0 CONCLUSION

The staff has completed its review of the requested amendments to the Zion Nuclear Power Station TSs. The request for amendments is consistent with current licensing practice. The requested amendments ensure that Zion is maintained in a safe, stable condition. Accordingly, the requested license amendments to the Zion Nuclear Power Station TSs are acceptable.

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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