



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

September 16, 1982

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2  
Braidwood Station Units 1 and 2  
Application for Amendment to Facility  
Operating License NPF-37, NPF-66, NPF-72 and NPF-77  
NRC Docket Nos. 50-454, 455, 456 and 457

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specification of Facility Operating License NPF-37, NPF-66, NPF-72 and NPF-77. The proposed amendment revises Section 6 to delete reference to superceded documents pertaining to the training of licensed operators.

A detailed description of the proposed change is presented in Attachment A. The revised Technical Specification pages are contained in Attachment B.

The proposed change has been reviewed and approved by both on-site and off-site review in accordance with CECo procedures. CECo has reviewed this proposed amendment in accordance with 10 CFR 50.92(c) and has determined that no significant hazards consideration exists. This evaluation is documented in Attachment C. An Environmental Assessment has been completed and is contained in Attachment D.

CECo is notifying the State of Illinois of our application for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

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To the best of my knowledge and belief the statements contained herein are true and correct. In some respects, these statements are not based on my personal knowledge but upon information received from other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please direct any questions regarding this matter to this office.

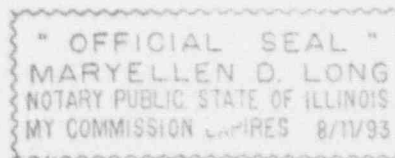
Sincerely,

*Terrence W. Simpkin*

T.W. Simpkin  
Nuclear Licensing Administrator

cc: R.M. Pulsifer, Project Manager - NRR  
J.B. Hickman, Project Manager - NRR  
S.G. DuPont, Resident Inspector - Braidwood  
W.J. Kropp, Resident Inspector - Byron  
Document Control Desk - NRR  
Region III Office  
Office of Nuclear Facility Safety - IDNS

*Maryellen D. Long*  
*9-16-92*  
*County of DuPAGE*



## ATTACHMENT A

### DETAILED DESCRIPTION OF THE PROPOSED CHANGES

#### Description of the Current Operating License (OL) Requirements:

Specification 6.3.1 imposes additional requirements for the qualification of licensed Operators and Senior Operators. These requirements are delineated in Section A of Enclosure 1 of the March 28, 1980 Nuclear Regulatory Commission (NRC) letter to all licensees. These requirements are in addition to those mandated by Title 10, Code of Federal Regulations, Part 55 (10 CFR 55).

Specification 6.4.1 states that the requalification training program of licensed Operators and Senior Operators will comply with the requirements of Appendix A of 10 CFR 55. Specification 6.4.1 also imposes additional requirements for the requalification training of licensed Operators and Senior Operators. These requirements are delineated in Section C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. These requirements are in addition to those mandated by 10 CFR 55.

#### Bases of the Current OL Requirements:

The requirements of these Specifications are based on the provisions of NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, in effect at the time that Byron and Braidwood Stations were licensed.

#### Description of the Need for Amending the Technical Specifications:

The requirements of the March 28, 1980 NRC letter to all licensees were superseded by the issuance of NUREG-1021, Operator Licensing Examiner Standards. Additionally, the reference to Appendix A of 10 CFR 55 is no longer correct. Appendix A was incorporated into the body of the regulation during a previous revision of the regulation.

#### **Description of the Proposed Amendment:**

The proposed amendment would delete the reference to the March 28, 1980 NRC letter to all licensees in Specifications 6.3.1 and 6.4.1.

The proposed amendment would also delete the reference to Appendix A of 10 CFR 55 in specification 6.4.1.

#### **Basis for the Proposed Amendment:**

The purpose of the March 28, 1980 NRC letter to all licensees was to set forth revised criteria to be used by the NRC staff in evaluating reactor operator training and licensing under the regulations in effect at the time of the letter. These revised criteria were established based on the Commission review of the Three Mile Island Unit 2 accident which occurred on March 28, 1979. The letter stated that the Commission review in the area of operator training and qualification would continue and could be expected to result in additional criteria being established. The letter also stated that final requirements would be established through rule making proceedings.

The continued Commission review in the area of operator training and qualification resulted in revisions to 10 CFR 55 and the issuance of NUREG-1021, Operator Licensing Examiner Standards, which provides guidance regarding the implementation of 10 CFR 55 requirements. These requirements supercede those delineated in the March 28, 1980 NRC letter to all licensees.

Since the initial license examinations at both Byron and Braidwood Stations, operator training and qualification has been evaluated against the requirements of NUREG-1021.

The reference to Appendix A of 10 CFR 55 is no longer correct since the requirements of what used to be Appendix A have been incorporated into the body of the regulation. Furthermore, it is unnecessary to commit to compliance with requirements already mandated by regulation.

#### **Schedular Requirements:**

There are no schedular restraints associated with this proposed amendment.