ATTACHMENT A

PROPOSED CHANGE TO APPENDIX A

TECHNICAL SPECIFICATION TO OPERATING LICENSES

NPF-11 and NPF-18

Revised Pages:

NPF-11	NPF-18
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6-3	6-3
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6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, INVESTIGATION, AND AUDIT

A. The Station ~~Superintendent~~ Manager shall have overall full-time responsibility for safe operation of the facility. During periods when the Station ~~Superintendent~~ Manager is unavailable, he shall designate this responsibility to an established alternate who satisfies the ANSI N18.1 of March 8, 1971 experience requirements for plant manager.

The Shift Supervisor shall be responsible for directing and commanding the overall operation of the facility on his shift. The primary management responsibility of the Shift Supervisor shall be for safe operation of the nuclear facility on his shift under all conditions. A management directive signed by ~~Division~~ Vice President ~~Nuclear Stations~~ emphasizing this primary management responsibility and that clearly establishes the command duties of the Shift Supervisor shall be reissued to all station personnel on an annual basis.

B. The corporate management which relates to the operation of this station is shown in Figure 6.1-1.

C. The normal functional organization for operation of the station shall be as shown in Figure 6.1-2. The shift manning for the station shall be as shown in Figure 6.1-3. The individual filling the position of Assistant Superintendent ~~Administrative and Support~~ Services shall meet the minimum acceptable level for "Technical Manager" as described in Section 4.2.4 of ANSI N18.1-1971.

1. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator who has been designated by the Shift Supervisor to assume the control room direction responsibility shall be in the Control Room.

2. A health physics technician* shall be on site when fuel is in the reactor.

3. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

4. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include the Shift Supervisor, the Station Control Room Engineer and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

*The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accomodate unexpected absence provided immediate action is taken to fill the required positions.

~~See next page 6-1a~~

**Figure 6.1-2 indicates that the Operating Assistant Superintendent is required to hold an SRO license. The following exemption from this requirement is authorized until September 30, 1983:

An individual who meets the requirements of ANSI N18.1-1971, for the ANSI positions of Plant Manager and Operations Manager, with the sole exception that he does not hold a current SRO license at LaSalle, will be allowed to assume the position of Operating Assistant Superintendent, providing

a. He sits for the SRO examination at LaSalle no later than the first opportunity after six months following his appointment to the position.

b. Operating decisions made by this individual prior to his holding a current SRO at LaSalle shall be approved by, or directed through, individual(s) holding a current SRO license at LaSalle.

Any deviation from the above guidelines shall be authorized by the ~~Station~~ applicable Superintendent or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Station~~ applicable Superintendent or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

D. 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. The Rad/Chem Supervisor shall meet the requirements of radiation protection manager of Regulatory Guide 1.8, September, 1975. The ANSI N18.1-1971 qualification requirements for Rad/Chem Technician may also be met by either of the following alternatives:

1. Individuals who have completed the Rad/Chem Technician training program and have accrued 1 year of working experience in the specialty, or

2. Individuals who have completed the Rad/Chem Technician training program, but have not yet accrued 1 year of working experience in the specialty, who are supervised by on-shift health physics supervision who meet the requirements of ANSI N18.1-1971 Section 4.3.2, "Supervisor Not Requiring AEC Licenses," or Section 4.4.4, "Radiation Protection."

E. 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 and Appendix "A" of 10 CFR Part 55, and shall include familiarization with relevant industry operational experience identified by the ONSG.

F. Retraining shall be conducted at intervals not exceeding 2 years.

G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall be appointed by the ~~Director,~~ Nuclear Safety. The Audit Function shall be the responsibility of the Manager of Quality Assurance and shall be independent of operations.

a. Offsite Review and Investigative Function

The ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage

under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of non-compliance with NRC requirements to the Station ~~Superintendent~~, ~~Division Vice President~~ Nuclear Stations, Manager of Quality Assurance, and the Vice President - Nuclear Operations. During periods when the ~~Supervisor~~ of Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate, who satisfies the formal training and experience for the ~~Supervisor~~ of the Offsite Review and Investigate Function. The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

1) The safety evaluations for (1) changes to procedures, equipment, or systems as described in the safety analysis report and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of Quality Assurance.
2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
4) Proposed changes in Technical Specifications or NRC operating licenses.
5) Noncompliance with NRC requirements, or of internal procedures, or instructions having nuclear safety significance.
6) Significant operating abnormalities or deviation from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function.
7) Reportable occurrences requiring 24 hour notification to the NRC.
8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station ~~Superintendent~~, ~~Division Vice President~~ - Nuclear Stations, and Manager of Quality Assurance.

b. Audit Function

(operations) and the Director of Quality Assurance (maintenance).

The Audit Function shall be the responsibility of the Manager of Quality Assurance independent of the Production Department. Such responsibility is delegated to the Director of Quality Assurance ~~for Operating and the Staff Assistant to the Manager of Quality Assurance for maintenance quality assurance activities~~,

of the above, or designated Corporate Staff or Supervisor approved by the Manager of Quality assurance,

Either shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within a period of 2 years or less as designated below.

1) Audit of the conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.

2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.

3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.

4) Audit of the peformance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B" 10 CFR 50.

5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.

6) Audit of the Eacility Security Plan and implementing procedures.

7) Audit onsite and offsite reviews.

8) Audit the Facility Fire Protection Program and implementing procedures.

9) The radiological environmental monitoring program and the results thereof at least once per 12 months.

10) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.

Audit Function (Continued)

11) The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.

12) The performance of activities required by the Company Quality Assurance Program and Procedures to meet the criteria of Regulatory Guide 4.15, December 1977, at least once per 12 months.

Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station ~~Superintendent~~ Manager, ~~Director~~ Manager of Nuclear Safety, the ~~Division~~ Vice President - Nuclear Stations, Manager of Quality Assurance, the Vice Chairman, and the Vice President - Nuclear Operations.

c. Authority

The Manager of Quality Assurance reports to the ~~Vice~~ Chairman of the Board and the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function reports to the ~~Director~~ Manager of Nuclear Safety. Either the Manager of Quality Assurance or the ~~Supervisor~~ Superintendent of the Offsite Review and Investigation Function has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

d. Records

1) Reviews, audits, and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b

2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the offsite reviews and investigative functions described in Specification 6.1.G.1.a. and for the audit functions described in Specification 6.1.G.1.b. Those procedures shall cover the following:

1) Content and method of submission of presentations to the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function.

2) Use of committees and consultants.

3) Review and approval.

4) Detailed listing of items to be reviewed.

5) Method of (1) appointing personnel, (2) performing reviews, investigations, (3) reporting findings and recommendations of reviews and investigations, (4) approving reports, and (5) distributing reports.

6) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the review and investigative function.

Offsite Review and Investigative Function (Continued)

f. Personnel

1) The persons, including consultants, performing the review and investigative function, in addition to the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated:

a) nuclear power plant technology,
b) reactor operations,
c) utility operations,
d) power plant design,
e) reactor engineering,
f) radiological safety,
g) reactor safety analysis,
h) instrumentation and control,
i) metallurgy, and
j) any other appropriate disciplines required by unique characteristics of the facility.

2) Individuals performing the Review and Investigative Function shall possess a minimum formal training and experience as listed below for each discipline.

a) Nuclear Power Plant Technology

Engineering graduate or equivalent with 5 years experience in the nuclear power field design and/or operation.

b) Reactor Operations

Engineering graduate or equivalent with 5 years experience in nuclear power plant operations.

c) Utility Operations

Engineering graduate or equivalent with at least 5 years of experience in utility operation and/or engineering.

d) Power Plant Design

Engineering graduate or equivalent with at least 5 years of experience in power plant design and/or operation.

e) Reactor Engineering

Engineering graduate or equivalent. In addition, at least 5 years of experience in nuclear plant engineering, operation, and/or graduate work in nuclear engineering or equivalent in reactor physics is required.

Offsite Review and Investigative Function (Continued)

f) Radiological Safety

Engineering graduate or equivalent with at least 5 years of experience in radiation control and safety.

g) Reactor Safety Analysis

Engineering graduate or equivalent with at least 5 years of experience in nuclear engineering.

h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

Superintendent →

3) The ~~Supervisor~~ of the Offsite Review and Investigative Function shall have experience and training which satisfy ANSI N18.1-1971 requirements for plant managers.

2. The Onsite Review and Investigative Function shall be supervised by the Station ~~Superintendent~~ Manager.

a. Onsite Review and Investigative Function

The Station ~~Superintendent~~ Manager shall: (1) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate directions; (2) approve participants for this function; (3) assure that a component of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive interdisciplinary review coverage under this function; (4) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (5) report all findings of noncompliance with NRC requirements, and provide recommendations to the ~~Division Vice President~~ Nuclear Stations and the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function; and (6) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the Onsite Review and Investigative Function.

Assistant Vice President and General Manager

The responsibilities of the personnel performing this function are stated below:

1) Review of (1) procedures required by Specification 6.2 and changes thereto, (2) all programs required by Specification 6.2 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the ~~Plant Superintendent~~ Station Manager to affect nuclear safety.

2) Review of all proposed test and experiments that affect nuclear safety.

Onsite Review and Investigative Function (Continued)

3) Review of all proposed changes to the Technical Specifications.

4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the ~~Division Vice President~~-Nuclear Stations and to the ~~Supervisor~~ Superintendent of the Offsite ~~Nuclear~~ Review and Investigative Function.

6) Review of facility operations to detect potential safety hazards.

7) Performance of special reviews and investigations and reports thereon as requested by the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function.

8) Review of the Station Security Plan and shall submit recommended changes to the ~~Division Vice President~~-Nuclear Stations.

9) Review of the Emergency Plan and station implementing procedures and shall submit recommended changes to the ~~Division Vice President~~-Nuclear Stations.

10) Review of reportable events and actions taken to prevent recurrence.

11) Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the ~~Division Vice President~~-Nuclear Stations and to the ~~Supervisor~~ Superintendent of the Offsite ~~Nuclear~~ Review and Investigative Function.

12) Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

b. Authority

The Technical Staff Supervisor is responsible to the Station ~~Superintendent~~ Manager and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation, and administrative procedures relating to facility operations and shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station ~~Superintendent~~ Manager shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the ~~Division Vice President~~-Nuclear Stations and the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function.

Onsite Review and Investigative Function (Continued)

c. Records

1) Reports, reviews, investigations, and recommendations shall be documented with copies to the ~~Division Vice President~~-Nuclear Stations, the ~~Supervisor~~ of the Offsite Review and Investigative Function, the Station ~~Superintendent~~, and the Manager of Quality Assurance.

2) Copies of all records and documentation shall be kept on file at the station.

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative Function. These procedures shall include the following:

1) Content and method of submission and presentation to the Station ~~Superintendent~~ ~~Division Vice President~~-Nuclear Stations, and the ~~Supervisor~~ of the Offsite Review and Investigative Function.

2) Use of committees.

3) Review and approval.

4) Detailed listing of items to be reviewed.

5) Procedures for administration of the quality control activities.

6) Assignment of responsibilities.

e. Personnel

1) The personnel performing the Onsite Review and Investigative Function, in addition to the Station ~~Superintendent~~, shall consist of persons having expertise in:

a) nuclear power plant technology,
b) reactor operations,
c) reactor engineering,
d) radiological safety and chemist,
e) Instrumentation and control, and
f) mechanical and electric systems.

2) Personnel performing the Onsite Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1-1971, Sections 4.2 and 4.4.

H. Fire Protection Program

An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

An inspection and audit of the fire protection and ~~loss~~ loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

FIGURE 6.1-1

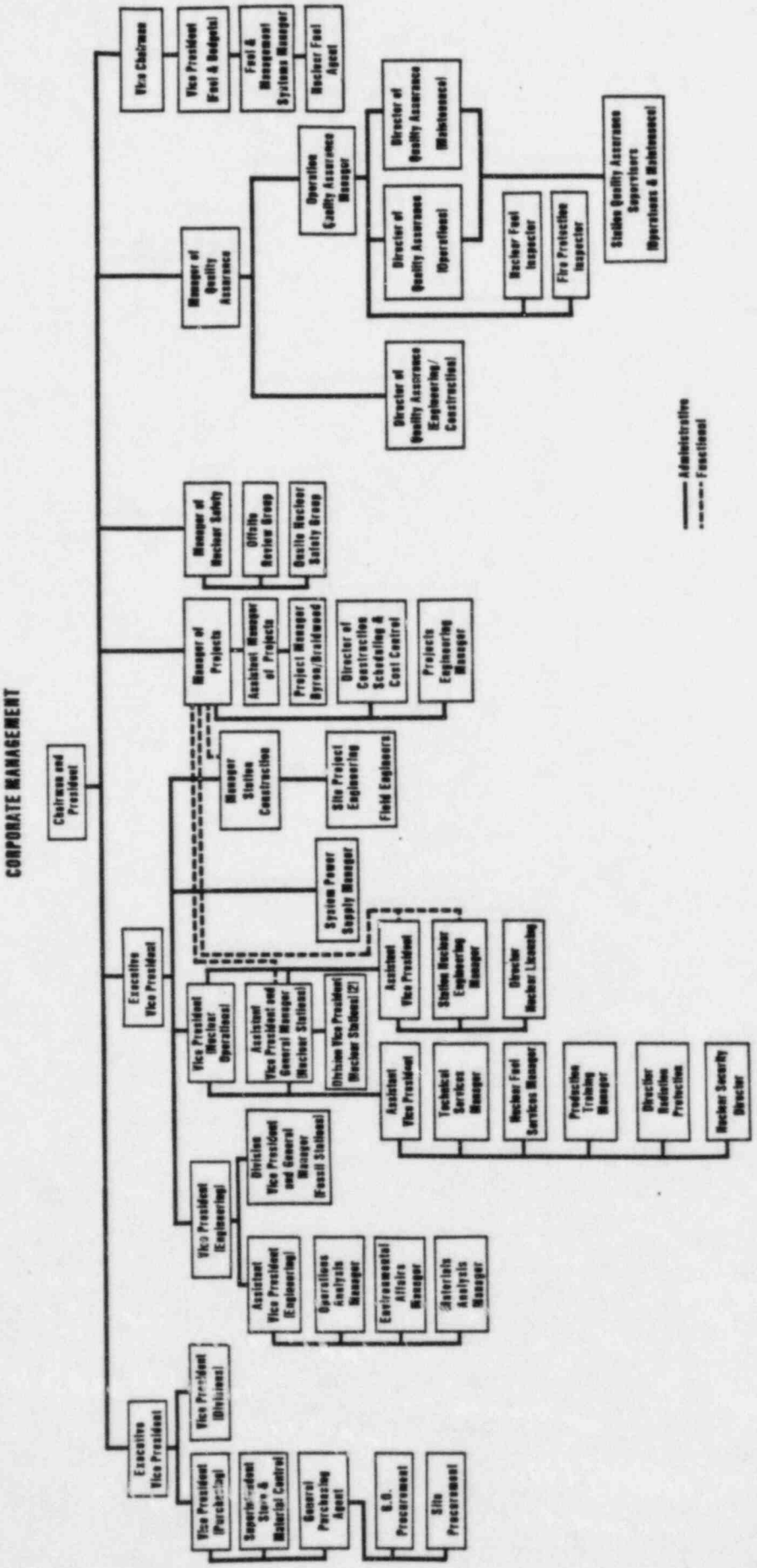
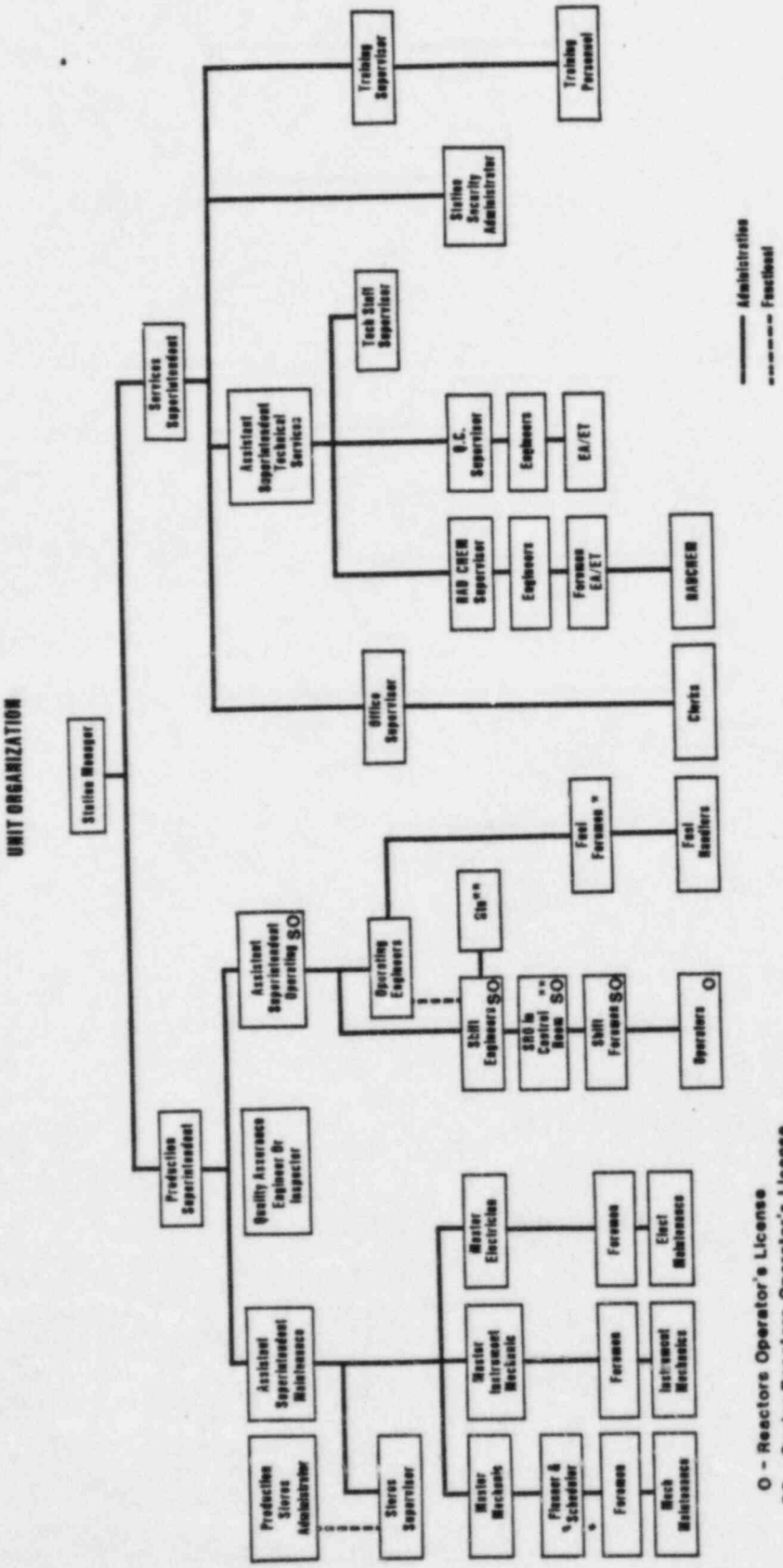

CORPORATE MANAGEMENT
Chairman and President
Executive Vice President
Vice President (Nuclear Operations)
Assistant Vice President and General Manager (Nuclear Stations)
Division Vice President (Nuclear Stations) (2)
Assistant Vice President
Technical Services Manager
Nuclear Fuel Services Manager
Production Training Manager
Director Radiation Protection
Nuclear Security Director
Station Nuclear Engineering Manager
Director Nuclear Licensing
System Power Supply Manager
Vice President (Engineering)
Division Vice President and General Manager (Fossil Stations)
Assistant Vice President (Engineering)
Operations Analysis Manager
Environmental Affairs Manager
Materials Analysis Manager
Executive Vice President
Vice President (Divisions)
Vice President (Purchasing)
Superintendent Store & Material Control
General Purchasing Agent
N.D. Procurement
Site Procurement
Vice Chairman
Vice President (Fuel & Budgets)
Fuel & Management Systems Manager
Nuclear Fuel Agent
Manager of Quality Assurance
Operation Quality Assurance Manager
Director of Quality Assurance (Operations)
Director of Quality Assurance (Maintenance)
Nuclear Fuel Inspector
Fire Protection Inspector
Station Quality Assurance Supervisors (Operations & Maintenance)
Director of Quality Assurance (Engineering/ Construction)
Manager of Nuclear Safety
Offsite Review Group
Onsite Nuclear Safety Group
Manager of Projects
Assistant Manager of Projects
Project Manager Byron/Braidwood
Director of Construction Scheduling & Cost Control
Projects Engineering Manager
Manager Station Construction
Site Project Engineering (Field Engineers)
Administrative
Functional

FIGURE 6.1-2


UNIT ORGANIZATION
Station Manager
Services Superintendent
Production Superintendent
Training Supervisor
Training Personnel
Station Security Administrator
Tech Staff Supervisor
Assistant Superintendent Technical Services
Q.C. Supervisor
Engineers
EA/ET
RAD CHEM Supervisor
Engineers
Foreman EA/ET
RADCHEM
Assistant Superintendent Operating SO
Operating Engineers
Shift Engineers SO
SRO in Control Room SO
Shift Foreman SO
Operators O
Shift**
Fuel Foreman *
Fuel Handlers
Office Supervisor
Clerks
Quality Assurance Engineer Or Inspector
Assistant Superintendent Maintenance
Master Electrician
Foreman
Elect Maintenance
Master Instrument Mechanic
Foreman
Instrument Mechanics
Production Stores Administrator
Stores Supervisor
Master Mechanic
Planner & Scheduler *
Foreman
Mech Maintenance
Administration
Functional
O - Reactors Operator's License
SO - Senior Reactors Operator's License
* - The Fuel Handling Foreman shall have a limited Senior Reactor Operator's License
** May be filled by a SCRE.

PLANT OPERATING PROCEDURES AND PROGRAMS (Continued)

B. Radiation control procedures shall be maintained, made available to all station personnel, and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or instrument maintenance, and by ~~Maintenance Engineer~~ the Assistant Superintendent Maintenance and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the Technical Staff Supervisor and the ~~Radiological Chemical~~ Radiation Chemistry Supervisor. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto, must have authorization by the Station ~~Superintendent~~ Manager before being implemented.

2. Work and instruction type procedures which implement approved maintenan or modification procedures shall be approved and authorized by the Maintenance ~~Engineer~~ Assistant Superintendent wherethe written authority has been provided by the Station ~~Superintendent~~ Manager. The "Maintenance/Modification Procedure" utilized for safety-related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

1. The intent of the original procedure is not altered.
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's Licese on the unit affected.
3. The change is documented, reviewed by the Onsite Review and Investigative Function and approved by the Station ~~Superintendent~~ Manager within 14 days of implementation.

E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at frequencies as specified in the Generating Stations Emergency Plan (GSEP). These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

assistant Vice President and General Manager

6.4 ACTION TO BE TAKEN IN THE EVENT A SAFETY LIMIT IS EXCEEDED

If a safety limit is exceeded, the reactor shall be shut down immediately pursuant to Specification 2.1.1, 2.1.2 and 2.1.3, and critical reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the ~~Division Vice President~~-Nuclear Stations or his designated alternate. The incident shall be reviewed pursuant to Specifications 6.1.G.1.a and 6.I.G.2.a and a separate License Event Report for each occurrence shall be prepared in accordance with Section 50.73 to 10 CFR Part 50. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The ~~Division Vice President~~-Nuclear Stations and the ~~Director~~ Manager of Nuclear Safety shall be notified within 24 hours.

6.5 PLANT OPERATING RECORDS

A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least 5 years:

1. Records of normal plant operation, including power levels and periods of operation at each power level;

2. Records of principal maintenance and activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety;

3. Records and reports of reportable events;

4. Records and periodic checks, inspection and/or calibrations performed to verify that the surveillance requirements (see Section 4 of these specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded;

5. Records of changes to operating procedures;

6. Shift engineers' logs; and

7. Byproduct material inventory records and source leak test results.

PLANT OPERATING RECORDS (Continued)

B. Records and/or logs relative to the following items shall be recorded in a manner convenient for review and shall be retained for the life of the plant:

1. Substitution or replacement of principal items of equipment pertaining to nuclear safety;
2. Changes made to the plant as it is described in the SAR;
3. Records of new and spent fuel inventory and assembly histories;
4. Updated, corrected, and as-built drawings of the plant;
5. Records of plant radiation and contamination surveys;
6. Records of offsite environmental monitoring surveys;
7. Records of radiation exposure for all plant personnel, including all contractors and visitors to the plant, in accordance with 10 CFR Part 20;
8. Records of of radioactivity in liquid and gaseous wastes released to the environment;
9. Records of transient or operational cycling for those components that have been designed to operate safety for a limited number of transient or operational cycles (identified in Table 5.7.1-1);
10. Records of individual staff members indicating qualifications, experience, training, and retraining;
11. Inservice inspections of the reactor coolant system;
12. Minutes of meetings and results of reviews and audits performed by the offsite and onsite review and audit functions;
13. Records of reactor tests and experiments;
14. Records of Quality Assurance activities required by the QA Manual except for those items specified in Section 6.5.A;
15. Records of reviews performed for changes made to procedures on equipment or reviews of tests and experiments pursuant to 10 CFR 50.59; and
16. Records of the service lives of all hydraulic and mechanical snubbers required by specification 3.7.9 including the date at which the service life commences and associated installation and maintenance records.
17. Records of analyses required by the radiological environmental monitoring program.

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, INVESTIGATION, AND AUDIT

A. The Station ~~Superintendent~~ Manager shall have overall full-time responsibility for safe operation of the facility. During periods when the Station ~~Superintendent~~ Manager is unavailable, he shall designate this responsibility to an established alternate who satisfies the ANSI N18.1 of March 8, 1971 experience requirements for plant manager.

The Shift Supervisor shall be responsible for directing and commanding the overall operation of the facility on his shift. The primary management responsibility of the Shift Supervisor shall be for safe operation of the nuclear facility on his shift under all conditions. A management directive signed by ~~Division~~ Vice President ~~Nuclear Stations~~ and General Manager - Nuclear Stations emphasizing this primary management responsibility and that clearly establishes the command duties of the Shift Supervisor shall be reissued to all station personnel on an annual basis.

B. The corporate management which relates to the operation of this station is shown in Figure 6.1-1.

C. The normal functional organization for operation of the station shall be as shown in Figure 6.1-2. The shift manning for the station shall be as shown in Figure 6.1-3. The individual filling the position of Assistant Superintendent ~~Administrative and Support~~ Services shall meet the minimum acceptable level for "Technical Manager" as described in Section 4.2.4 of ANSI N18.1-1971.

1. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator who has been designated by the Shift Supervisor to assume the control room direction responsibility shall be in the Control Room.

2. A health physics technician* shall be on site when fuel is in the reactor.

3. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

4. A site Fire Brigade of at least 5 members shall be maintained onsite at all times*. The Fire Brigade shall not include the Shift Supervisor, the Station Control Room Engineer and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

The individuals filling the Positions of Production Superintendent and Services Superintendent shall meet the Minimum acceptable level for "Plant Manager" as described in Sec. 4.2.1 of ANSI N18.1-1971.

*The health physics technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accomodate unexpected absence provided immediate action is taken to fill the required positions.

Any deviation from the above guidelines shall be authorized by the ~~(Station~~ applicable Superintendent or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Station~~ applicable Superintendent or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

D. 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. The Rad/Chem Supervisor shall meet the requirements of radiation protection manager of Regulatory Guide 1.8, September, 1975. The ANSI N18.1-1971 qualification requirements for Rad/Chem Technician may also be met by either of the following alternatives:

1. Individuals who have completed the Rad/Chem Technician training program and have accrued 1 year of working experience in the specialty, or

2. Individuals who have completed the Rad/Chem Technician training program, but have not yet accrued 1 year of working experience in the specialty, who are supervised by on-shift health physics supervision who meet the requirements of ANSI N18.1-1971 Section 4.3.2, "Supervisor Not Requiring AEC Licenses," or Section 4.4.4, "Radiation Protection."

E. 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 and Appendix "A" of 10 CFR Part 55, and shall include familiarization with relevant industry operational experience identified by the ONSG.

F. Retraining shall be conducted at intervals not exceeding 2 years.

G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall be appointed by the ~~Director,~~ Manager of Nuclear Safety. The Audit Function shall be the responsibility of the Manager of Quality Assurance and shall be independent of operations.

   a. Offsite Review and Investigative Function

   The ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall: (1) provide directions for the review and investigative function and appoint a senior participant to provide appropriate direction, (2) select each participant for this function, (3) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage

under this function, (4) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (5) approve and report in a timely manner all findings of non-compliance with NRC requirements to the Station ~~Superintendent~~, ~~Division Vice President~~ Nuclear Stations, Manager of Quality Assurance, and the Vice President - Nuclear Operations. During periods when the ~~Supervisor~~ of Offsite Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate, who satisfies the formal training and experience for the ~~Supervisor~~ of the Offsite Review and Investigate Function. The responsibilities of the personnel performing this function are stated below. The Offsite Review and Investigative Function shall review:

1) The safety evaluations for (1) changes to procedures, equipment, or systems as described in the safety analysis report and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of Quality Assurance.
2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
4) Proposed changes in Technical Specifications or NRC operating licenses.
5) Noncompliance with NRC requirements, or of internal procedures, or instructions having nuclear safety significance.
6) Significant operating abnormalities or deviation from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function.
7) Reportable occurrences requiring 24 hour notification to the NRC.
8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such change.
10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station ~~Superintendent~~, ~~Division Vice President~~ - Nuclear Stations, and Manager of Quality Assurance.

b. Audit Function

(operations) and the Director of Quality Assurance (maintenance).

The Audit Function shall be the responsibility of the Manager of Quality Assurance independent of the Production Department. Such responsibility is delegated to the Director of Quality Assurance ~~for Operating and the Staff Assistant to the Manager of Quality Assurance for maintenance quality assurance activities~~,

of the above, or designated Corporate Staff or Supervisor approved by the Manager of Quality assurance,

Either shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within a period of 2 years or less as designated below.

1) Audit of the conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.

2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.

3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety at least once per 6 months.

4) Audit of the peformance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B" 10 CFR 50.

5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.

6) Audit of the Eacility Security Plan and implementing procedures.

7) Audit onsite and offsite reviews.

8) Audit the Facility Fire Protection Program and implementing procedures.

9) The radiological environmental monitoring program and the results thereof at least once per 12 months.

10) The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.

Audit Function (Continued)

11) The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.

12) The performance of activities required by the Company Quality Assurance Program and Procedures to meet the criteria of Regulatory Guide 4.15, December 1977, at least once per 12 months.

Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station ~~Superintendent~~ Manager, ~~Director~~ Manager of Nuclear Safety, the ~~Division~~ Vice President - Nuclear Stations, Manager of Quality Assurance, the Vice Chairman, and the Vice President - Nuclear Operations.

c. Authority

The Manager of Quality Assurance reports to the ~~Vice~~ Chairman of the Board and the ~~Supervisor~~ of the Offsite Review and Investigative Function reports to the ~~Director~~ Nuclear Safety. Either the Manager of Quality Assurance or the ~~Supervisor~~ of the Offsite Review and Investigation Function has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

d. Records

1) Reviews, audits, and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b

2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the offsite reviews and investigative functions described in Specification 6.1.G.1.a. and for the audit functions described in Specification 6.1.G.1.b. Those procedures shall cover the following:

1) Content and method of submission of presentations to the ~~Supervisor~~ of the Offsite Review and Investigative Function.

2) Use of committees and consultants.

3) Review and approval.

4) Detailed listing of items to be reviewed.

5) Method of (1) appointing personnel, (2) performing reviews, investigations, (3) reporting findings and recommendations of reviews and investigations, (4) approving reports, and (5) distributing reports.

6) Determining satisfactory completion of action required based on approved findings and recommendations reported by personnel performing the review and investigative function.

Offsite Review and Investigative Function (Continued)

f. Personnel

1) The persons, including consultants, performing the review and investigative function, in addition to the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated:

a) nuclear power plant technology,
b) reactor operations,
c) utility operations,
d) power plant design,
e) reactor engineering,
f) radiological safety,
g) reactor safety analysis,
h) instrumentation and control,
i) metallurgy, and
j) any other appropriate disciplines required by unique characteristics of the facility.

2) Individuals performing the Review and Investigative Function shall possess a minimum formal training and experience as listed below for each discipline.

a) Nuclear Power Plant Technology

Engineering graduate or equivalent with 5 years experience in the nuclear power field design and/or operation.

b) Reactor Operations

Engineering graduate or equivalent with 5 years experience in nuclear power plant operations.

c) Utility Operations

Engineering graduate or equivalent with at least 5 years of experience in utility operation and/or engineering.

d) Power Plant Design

Engineering graduate or equivalent with at least 5 years of experience in power plant design and/or operation.

e) Reactor Engineering

Engineering graduate or equivalent. In addition, at least 5 years of experience in nuclear plant engineering, operation, and/or graduate work in nuclear engineering or equivalent in reactor physics is required.

Offsite Review and Investigative Function (Continued)

f) Radiological Safety

Engineering graduate or equivalent with at least 5 years of experience in radiation control and safety.

g) Reactor Safety Analysis

Engineering graduate or equivalent with at least 5 years of experience in nuclear engineering.

h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

3) The ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function shall have experience and training which satisfy ANSI N18.1-1971 requirements for plant managers.

2. The Onsite Review and Investigative Function shall be supervised by the Station ~~Superintendent~~ Manager.

a. Onsite Review and Investigative Function

The Station ~~Superintendent~~ Manager shall: (1) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate directions; (2) approve participants for this function; (3) assure that a component of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive interdisciplinary review coverage under this function; (4) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (5) report all findings of noncompliance with NRC requirements, and provide recommendations to the ~~Division Vice President~~ Assistant Vice President and General Manager-Nuclear Stations and the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function; and (6) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the Onsite Review and Investigative Function.

The responsibilities of the personnel performing this function are stated below:

1) Review of (1) procedures required by Specification 6.2 and changes thereto, (2) all programs required by Specification 6.2 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the ~~Plant Superintendent~~ Station Manager to affect nuclear safety.

2) Review of all proposed test and experiments that affect nuclear safety.

Onsite Review and Investigative Function (Continued)

3) Review of all proposed changes to the Technical Specifications.

4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the ~~Division Vice President~~-Nuclear Stations and to the ~~Supervisor~~ Superintendent of the Offsite ~~Nuclear~~ Review and Investigative Function.

6) Review of facility operations to detect potential safety hazards.

7) Performance of special reviews and investigations and reports thereon as requested by the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function.

8) Review of the Station Security Plan and shall submit recommended changes to the ~~Division Vice President~~-Nuclear Stations.

9) Review of the Emergency Plan and station implementing procedures and shall submit recommended changes to the ~~Division Vice President~~-Nuclear Stations.

10) Review of reportable events and actions taken to prevent recurrence.

11) Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the ~~Division Vice President~~-Nuclear Stations and to the ~~Supervisor~~ Superintendent of the Offsite ~~Nuclear~~ Review and Investigative Function.

12) Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

b. Authority

The Technical Staff Supervisor is responsible to the Station ~~Superintendent~~ Manager and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation, and administrative procedures relating to facility operations and shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station ~~Superintendent~~ Manager shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the ~~Division Vice President~~-Nuclear Stations and the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function.

Onsite Review and Investigative Function (Continued)

c. Records

1) Reports, reviews, investigations, and recommendations shall be documented with copies to the ~~Division Vice President~~ Nuclear Stations, the ~~Supervisor~~ of the Offsite Review and Investigative Function, the Station ~~Superintendent~~ Manager, and the Manager of Quality Assurance.

2) Copies of all records and documentation shall be kept on file at the station.

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the Onsite Review and Investigative Function. These procedures shall include the following:

1) Content and method of submission and presentation to the Station ~~Superintendent~~ ~~Division Vice President~~ Nuclear Stations, and the ~~Supervisor~~ Superintendent of the Offsite Review and Investigative Function.

2) Use of committees.

3) Review and approval.

4) Detailed listing of items to be reviewed.

5) Procedures for administration of the quality control activities.

6) Assignment of responsibilities.

e. Personnel

1) The personnel performing the Onsite Review and Investigative Function, in addition to the Station ~~Superintendent~~ Manager, shall consist of persons having expertise in:

a) nuclear power plant technology,
b) reactor operations,
c) reactor engineering,
d) radiological safety and chemist,
e) Instrumentation and control, and
f) mechanical and electric systems.

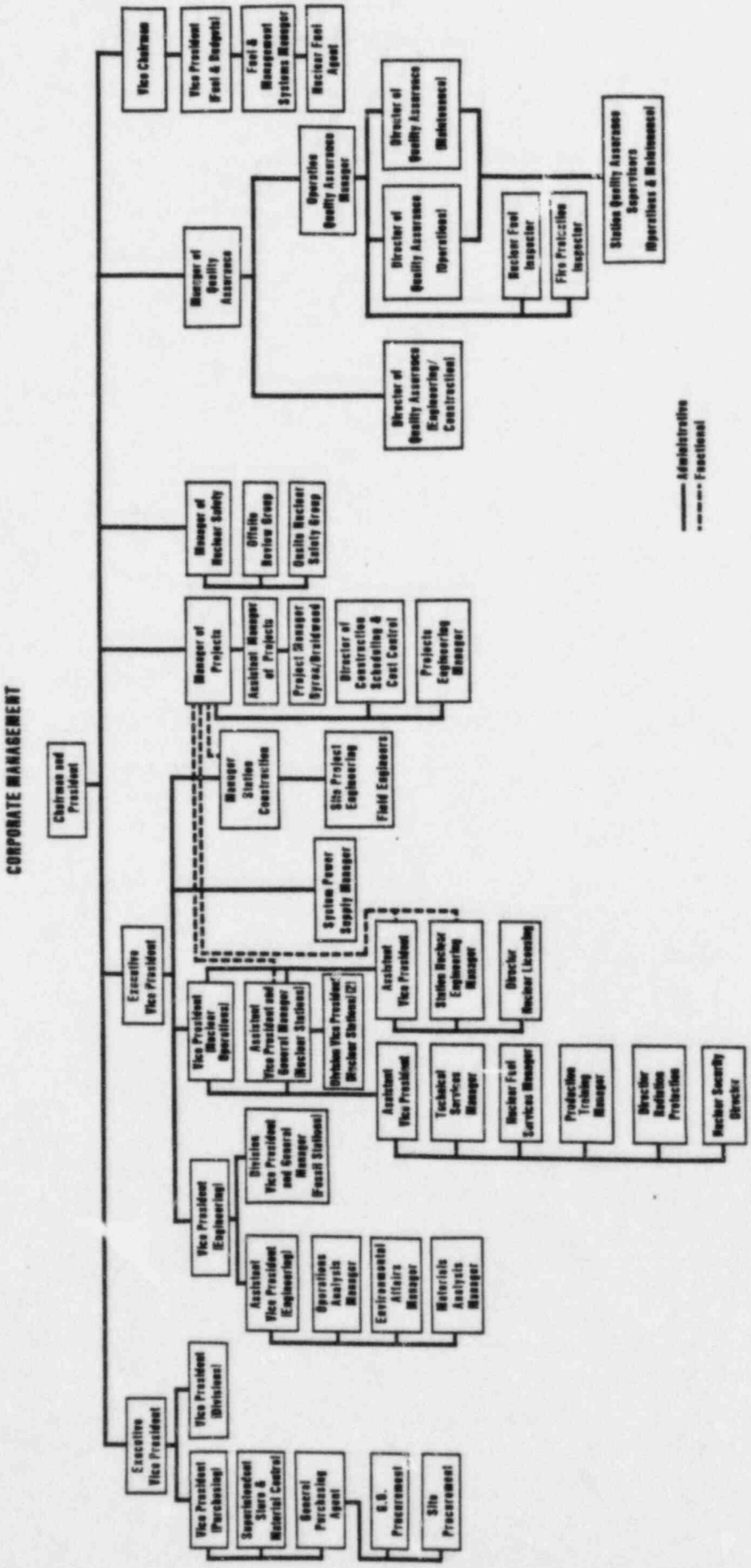
2) Personnel performing the Onsite Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1-1971, Sections 4.2 and 4.4.

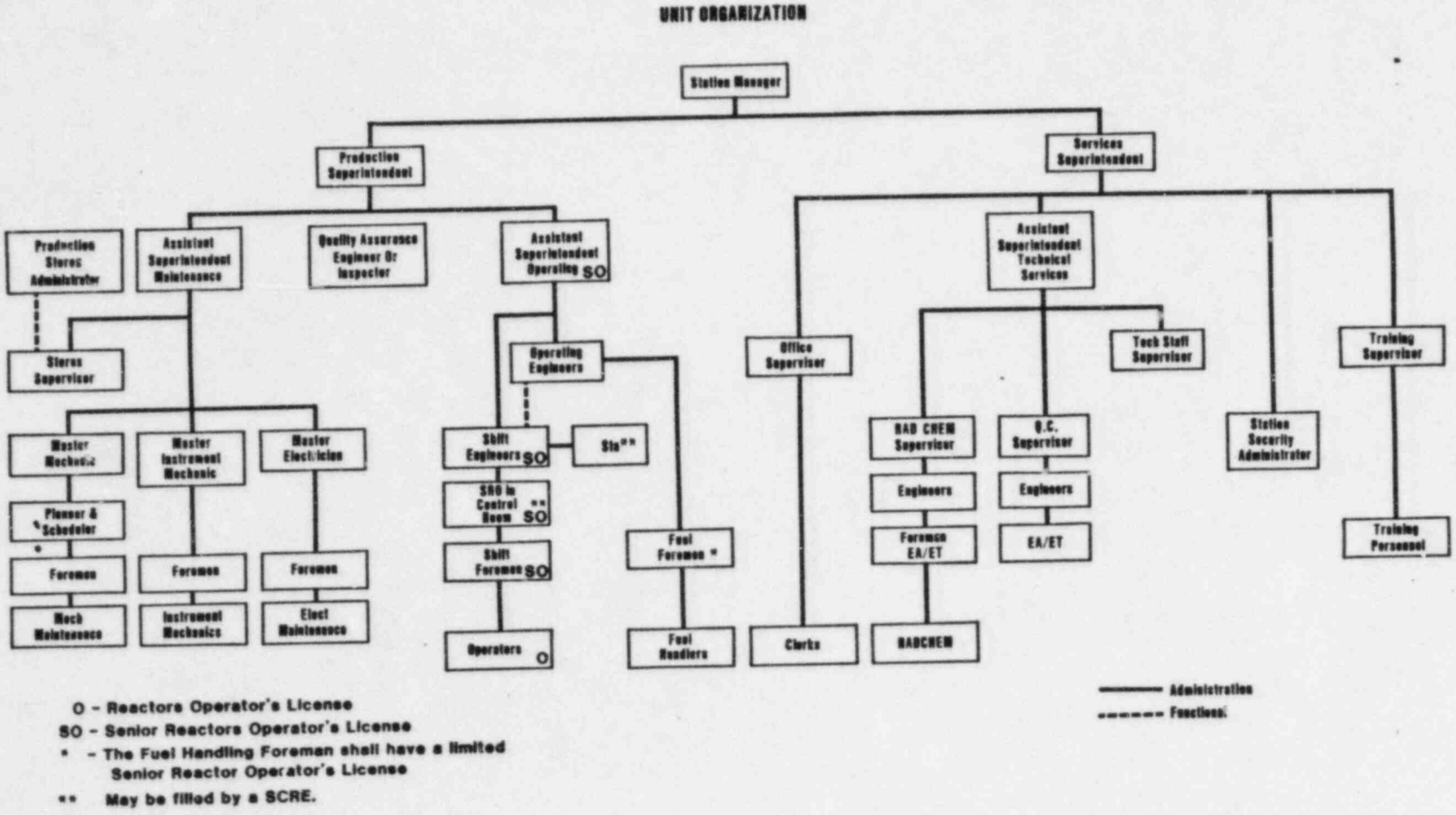
H. Fire Protection Program

An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.

An inspection and audit of the fire protection and ~~fire~~ loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

FIGURE 6.1-1


CORPORATE MANAGEMENT
Chairman and President
Vice Chairman
Vice President (Fuel & Budgets)
Fuel & Management Systems Manager
Nuclear Fuel Agent
Manager of Quality Assurance
Operations Quality Assurance Manager
Director of Quality Assurance (Maintenance)
Director of Quality Assurance (Operations)
Nuclear Fuel Inspector
Fire Protection Inspector
Station Quality Assurance Supervisors Operations & Maintenance
Director of Quality Assurance Engineering/ Construction
Manager of Nuclear Safety
Offsite Review Group
Onsite Nuclear Safety Group
Manager of Projects
Assistant Manager of Projects
Project Manager Byron/Braidwood
Director of Construction Scheduling & Cost Control
Projects Engineering Manager
Manager Station Construction
Site Project Engineering
Field Engineers
System Power Supply Manager
Executive Vice President
Vice President Nuclear Operations
Assistant Vice President and General Manager (Nuclear Stations)
Division Vice President Nuclear Stations (2)
Assistant Vice President
Station Nuclear Engineering Manager
Director Nuclear Licensing
Assistant Vice President
Technical Services Manager
Nuclear Fuel Services Manager
Production Training Manager
Director Radiation Protection
Nuclear Security Director
Vice President (Engineering)
Division Vice President and General Manager Stations
Assistant Vice President (Engineering)
Operations Analysis Manager
Environmental Affairs Manager
Materials Analysis Manager
Executive Vice President
Vice President (Divisional)
Vice President (Purchasing)
Superintendent Store & Material Control
General Purchasing Agent
G.O. Procurement
Site Procurement
Administrative
Functional



O - Reactors Operator's License

SO - Senior Reactors Operator's License

* - The Fuel Handling Foreman shall have a limited Senior Reactor Operator's License

** May be filled by a SCRE.

FIGURE 6.1-2

PLANT OPERATING PROCEDURES AND PROGRAMS (Continued)

B. Radiation control procedures shall be maintained, made available to all station personnel, and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or instrument maintenance, and by ~~Maintenance Engineer~~ the Assistant Superintendent Maintenance and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the Technical Staff Supervisor and the ~~Radiological Chemical~~ Radiation Chemistry Supervisor. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto, must have authorization by the Station ~~Superintendent~~ Manager before being implemented.

2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance ~~Engineer~~ Assistant Superintendent wherethe written authority has been provided by the Station ~~Superintendent~~ Manager. The "Maintenance/Modification Procedure" utilized for safety-related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

1. The intent of the original procedure is not altered.
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's Licese on the unit affected.
3. The change is documented, reviewed by the Onsite Review and Investigative Function and approved by the Station ~~Superintendent~~ Manager within 14 days of implementation.

E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at frequencies as specified in the Generating Stations Emergency Plan (GSEP). These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

assistant Vice President and General Manager

6.4 ACTION TO BE TAKEN IN THE EVENT A SAFETY LIMIT IS EXCEEDED

If a safety limit is exceeded, the reactor shall be shut down immediately pursuant to Specification 2.1.1, 2.1.2 and 2.1.3, and critical reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the ~~Division Vice President~~-Nuclear Stations or his designated alternate. The incident shall be reviewed pursuant to Specifications 6.1.G.1.a and 6.I.G.2.a and a separate License Event Report for each occurrence shall be prepared in accordance with Section 50.73 to 10 CFR Part 50. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The ~~Division Vice President~~-Nuclear Stations and the ~~Director~~ Manager of Nuclear Safety shall be notified within 24 hours.

6.5 PLANT OPERATING RECORDS

A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least 5 years:

1. Records of normal plant operation, including power levels and periods of operation at each power level;

2. Records of principal maintenance and activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety;

3. Records and reports of reportable events;

4. Records and periodic checks, inspection and/or calibrations performed to verify that the surveillance requirements (see Section 4 of these specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded;

5. Records of changes to operating procedures;

6. Shift engineers' logs; and

7. Byproduct material inventory records and source leak test results.

PLANT OPERATING RECORDS (Continued)

B. Records and/or logs relative to the following items shall be recorded in a manner convenient for review and shall be retained for the life of the plant:

1. Substitution or replacement of principal items of equipment pertaining to nuclear safety;
2. Changes made to the plant as it is described in the SAR;
3. Records of new and spent fuel inventory and assembly histories;
4. Updated, corrected, and as-built drawings of the plant;
5. Records of plant radiation and contamination surveys;
6. Records of offsite environmental monitoring surveys;
7. Records of radiation exposure for all plant personnel, including all contractors and visitors to the plant, in accordance with 10 CFR Part 20;
8. Records of of radioactivity in liquid and gaseous wastes released to the environment;
9. Records of transient or operational cycling for those components that have been designed to operate safety for a limited number of transient or operational cycles (identified in Table 5.7.1-1);
10. Records of individual staff members indicating qualifications, experience, training, and retraining;
11. Inservice inspections of the reactor coolant system;
12. Minutes of meetings and results of reviews and audits performed by the offsite and onsite review and audit functions;
13. Records of reactor tests and experiments;
14. Records of Quality Assurance activities required by the QA Manual except for those items specified in Section 6.5.A;
15. Records of reviews performed for changes made to procedures on equipment or reviews of tests and experiments pursuant to 10 CFR 50.59; and
16. Records of the service lives of all hydraulic and mechanical snubbers required by specification 3.7.9 including the date at which the service life commences and associated installation and maintenance records.
17. Records of analyses required by the radiological environmental monitoring program.

ATTACHMENT B

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison Company has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated or involve a significant reduction in the margin of safety. This amendment fits example (i) of actions involving no significant hazards consideration (48 FR 14870) which include "A purely administrative change to Technical Specifications."

Based on the preceding discussion, it is concluded that the proposed change clearly falls within all acceptable criteria with respect to the system or component, the consequences of previously evaluated accidents will not be increased and the margin of safety will not be decreased. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

0851K