

ADMINISTRATIVE CONTROLS

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## DEFINITIONS

### OFFSITE DOSE CALCULATION MANUAL

1.18 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Sections 6.8.4e and f, and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and ~~Semi-annual~~ Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.7.

### OPERABLE - OPERABILITY

1.19 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

### OPERATING LIMITS REPORT

1.19.a The OPERATING LIMITS REPORT is the unit-specific document that provides operating limits for the current operating reload cycle. These cycle-specific operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.9. Plant operation within these operating limits is addressed in individual specifications.

### OPERATIONAL MODE - MODE

1.20 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2.

### PHYSICS TESTS

1.21 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the core and related instrumentation: (1) described in Chapter 14.0 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

### PRESSURE BOUNDARY LEAKAGE

1.22 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a nonisolable fault in a Reactor Coolant System component body, pipe wall, or vessel wall.

### 3/4.11 RADIOACTIVE EFFLUENTS

#### 3/4.11.1 LIQUID EFFLUENTS

##### LIQUID HOLDUP TANKS

#### LIMITING CONDITION FOR OPERATION

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- 3.11.1.1 Deleted
- 3.11.1.2 Deleted
- 3.11.1.3 Deleted

3.11.1.4 The quantity of radioactive material, excluding tritium and dissolved or entrained noble gases, contained in any outside tanks shall be limited to the following:

- a. Primary Water Storage Tank  $\leq$  2000 Curies, and
- b. Outside Temporary Tank  $\leq$  10 Curies.

APPLICABILITY: At all times.

#### ACTION:

- a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank contents to within the limit, and describe the events leading to this condition in the next ~~Semiannual~~ Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.11.1.4 The quantity of radioactive material contained in each of the above tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

## RADIOACTIVE EFFLUENTS

### GAS DECAY TANKS

#### LIMITING CONDITION FOR OPERATION

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3.11.2.6 The quantity of radioactivity contained in each gas decay tank shall be limited to less than or equal to  $5 \times 10^4$  Curies of noble gases (considered as Xe-133 equivalent).

APPLICABILITY: At all times.

#### ACTION:

- a. With the quantity of radioactive material in any gas decay tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and, within 48 hours, reduce the tank contents to within the limit, and describe the events leading to this condition in the next ~~Semiannual~~ Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7.
- b. The provisions of Specification 3.0.3 are not applicable. †

#### SURVEILLANCE REQUIREMENTS

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4.11.2.6 The quantity of radioactive material contained in each gas decay tank shall be determined to be within the above limit at least once per 24 hours when radioactive materials are being added to the tank.

## ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Station Manager, Byron Station, shall be responsible for overall ~~unit~~ <sup>facility</sup> operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Engineer ~~(or during his absence from the control room, a designated individual)~~ shall be responsible for ~~the control room command function. A management directive to this effect, signed by the Vice President-Nuclear Operations shall be reissued to all station personnel on an annual basis.~~ <sup>directing the control room command function and the daily operations of the facility.</sup>

### 6.2 ORGANIZATION

#### 6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for ~~unit~~ <sup>facility</sup> operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- 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. These requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activities; Section 6 Interdepartmental Relationships.
- b. The Station Manager shall be responsible for overall ~~unit~~ <sup>facility</sup> safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Senior Vice President-Nuclear Operations shall have corporate responsibility for overall plant nuclear safety 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 nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

## ADMINISTRATIVE CONTROLS

### FACILITY

#### 6.2.2 ~~UNIT~~ STAFF

The ~~unit~~ <sup>facility</sup> staff shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1; and
- b. At least one licensed <sup>Reactor</sup> Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior <sup>Reactor</sup> Operator shall be in the control room;
- c. A Radiation Protection Technician,\* qualified in radiation protection procedures, shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall <sup>Reactor</sup> be observed and directly <sup>Reactor</sup> supervised by either a licensed Senior <sup>Reactor</sup> Operator or licensed Senior <sup>Reactor</sup> Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. Administrative procedures shall <sup>facility</sup> be developed and implemented to limit the working hours of ~~unit~~ <sup>facility</sup> staff who perform safety-related functions; e.g., licensed Senior <sup>Reactor</sup> Operators, licensed <sup>Reactor</sup> Operators, health physics personnel, equipment <sup>Reactor</sup> operators, and key <sup>Reactor</sup> maintenance personnel.

The amount of overtime worked by <sup>facility</sup> ~~unit~~ staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12);

- f. The Assistant Superintendent Operating shall hold a Senior Reactor Operator License.

#### 6.2.3 ONSITE NUCLEAR SAFETY GROUP (ONSG)

##### FUNCTION

6.2.3.1 The ONSG serves as an independent safety engineering group and shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The ONSG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Safety Assessment Manager, and the Station Manager, Byron Station.

##### COMPOSITION

6.2.3.2 The ONSG shall be composed of at least three, dedicated, full-time engineers located on site.

\*The Radiation Protection Technician may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

## ADMINISTRATIVE CONTROLS

### 6.2.3 ONSITE NUCLEAR SAFETY GROUP (ONSG) (Continued)

#### RESPONSIBILITIES

6.2.3.3 The ONSG shall be responsible for maintaining surveillance of plant activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### RECORDS

6.2.3.4 Records of activities performed by the ONSG shall be prepared, maintained, and forwarded each calendar month to the Safety Assessment Manager, and the Station Manager, Byron Station.

### 6.2.4 SHIFT TECHNICAL ADVISOR

*Engineer* The ~~Station Control Room Engineer (SCRE) may serve as the Shift Technical Advisor (STA) during abnormal operating or accident conditions. During these conditions the SCRE or other on duty STA shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit facility.~~ *advisory*

~~To assure capability for performance of all STA functions:~~

- ~~(1) The shift foreman (SRO) shall participate in the SCRE shift relief turnover.~~
- ~~(2) During the shift, the shift engineer and the shift foreman (SRO) shall be made aware of any significant changes in plant status in a timely manner by the SCRE.~~
- ~~(3) During the shift, the shift engineer and the shift foreman (SRO) shall remain abreast of the current plant status. The shift foreman (SRO) shall return to the control room two or three times per shift, where practicable, to confer with the SCRE regarding plant status. Where not practicable to return to the control room, the shift foreman (SRO) shall periodically check with the SCRE for a plant status update. The shift foreman (SRO) shall not abandon duties original to reactor operation, unless specifically ordered by the shift engineer.~~

\*Not responsible for sign-off function.



TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION		
	BOTH UNITS IN MODE 1, 2, 3, OR 4	BOTH UNITS IN MODE 5 OR 6 OR DEFUELED	ONE UNIT IN MODE 1, 2, 3 OR 4 AND ONE UNIT IN MODE 5 OR 6 OR DEFUELED
SE	1	1	1
SF	1	None <sup>##</sup>	1
RO	3 <sup>#</sup>	2 <sup>#</sup>	3 <sup>#</sup>
AO	3 <sup>#</sup>	3 <sup>#</sup>	3 <sup>#</sup>
STA or SCRE	1	None	1

- SE - Shift Supervisor (Shift Engineer) with a Senior Operator license
- SF - Shift Foreman with a Senior Operator license
- RO - Individual with an Operator license
- AO - Auxiliary Operator
- STA - Shift Technical Advisor
- SCRE - Station Control Room Engineer with a Senior Operator License

The Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the control room while the Unit is in MODE 1, 2, 3 or 4, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the Unit is in MODE 5 or 6, an individual with a valid Operator license shall be designated to assume the control room command function.

<sup>#</sup>At least one of the required individuals must be assigned to the designated position for each unit.

<sup>##</sup>At least one licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling must be present during Core Alterations on either unit, who has no other concurrent responsibilities.

Replace with Insert "A"

# INSERT "A"

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION (a) (f)

POSITION (b)	MINIMUM CREW NUMBER		
	EACH UNIT IN MODE 1, 2, 3, OR 4	ONE UNIT IN MODE 1, 2, 3, OR 4, AND ONE UNIT IN MODE 5, 6, OR DEFUELED	EACH UNIT IN MODE 5, 6, OR DEFUELED
SE	1	1	1
SRO	1	1	None (e)
RO (d)	3	3	2
AO (d)	3	3	3
STA (c)	1	1	None

- (a) The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for not more than 2 hours to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crew member being late or absent.
- (b) Table Notation:
- SE - Shift Engineer with a Senior Reactor Operator license
  - SRO - Individual with a Senior Reactor Operator license
  - RO - Individual with a Reactor Operator license or a Senior Reactor Operator license
  - AO - Auxiliary Operator
  - STA - Shift Technical Advisor
- (c) The STA position may be filled by any individual who meets the Commission Policy Statement on Engineering Expertise on Shift.
- (d) At least one of the required individuals must be assigned to the designated position for each unit.
- (e) At least one licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities must be present during CORE ALTERATIONS on either unit.
- (f) With either Unit in MODE 1, 2, 3, or 4, an individual with a Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. With both units in MODE 5, 6, or defueled, an individual with a SRO license or Reactor Operator license shall be designated to assume the control room command function.

## ADMINISTRATIVE CONTROLS

### FACILITY

#### 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the <sup>facility</sup> ~~unit~~ staff <sup>a supervisor in</sup> shall meet or exceed the minimum qualifications of ANSI N18.1-1971, except for the Health Physics ~~Supervisor or Lead~~ <sup>department,</sup> Health Physicist, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager.

#### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the <sup>facility</sup> ~~unit~~ staff shall be maintained under the direction of the Production Training Department and shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978, and shall include familiarization with relevant industry operational experience from the program managed by Quality Programs and Assessment.

#### 6.5 REVIEW INVESTIGATION AND AUDIT

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.

### OFFSITE

6.5.1 The Superintendent of the Offsite Review and Investigative Function shall be appointed by the Manager of Quality Assurance/Nuclear Safety (QA/NS) responsible for nuclear activities. The corporate audit function shall be the responsibility of the Manager of QA/NS and shall be independent of operations.

The Manager of QA/NS reports directly to the Chief Executive Officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the Manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate department to determine that QA/NS policy is being carried out.

#### a. Offsite Review and Investigative Function

The 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

## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

- f. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.10.
- g. Editorial and Typographical changes shall be made in accordance with station procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 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 holds a Senior Operator license on the Unit affected; and  
Reactor
- c. The change is documented, reviewed and approved in accordance with Specification 6.8.2 within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Reactor Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, and RHR System. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and
- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,

## ADMINISTRATIVE CONTROLS

### REPORTING REQUIREMENTS (Continued)

#### ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT\*

facility 6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the ~~unit~~ during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

#### SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT\*\*

A facility May 1 6.9.1.7 ~~The Semiannual~~ Radioactive Effluent Release <sup>year</sup> Report covering the operation of the ~~unit~~ during the previous ~~6 months of operation~~ shall be submitted <sup>prior to</sup> within 60 days after January 1 and July 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the ~~unit~~. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.  
facility.

#### MONTHLY OPERATING REPORT

6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or RCS safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the NRC Regional Office, no later than the 15th of each month following the calendar month covered by the report.

#### OPERATING LIMITS REPORT

6.9.1.9 Operating limits shall be established and documented in the OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle. The analytical methods used to determine the operating limits shall be those previously reviewed and approved by the NRC in Topical Reports: 1) WCAP 9272-P-A "Westinghouse Reload Safety Evaluations Methodology" dated July 1985, 2) WCAP-8385 "Power Distribution Control and Load Following Procedures" dated September 1974, 3) NFSR-0016 "Benchmark of PWR Nuclear Design Methods" dated July 1983, and/or 4) NFSR-0081 "Benchmark of PWR Nuclear Design Methods Using the PHOENIX-P and ANC Computer Codes" dated July 1990. The operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

\*A single submittal may be made for a multi-unit station.

\*\*A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

## ADMINISTRATIVE CONTROLS

### RECORD RETENTION (Continued)

- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those ~~unit~~<sup>facility</sup> components identified in Table 5.7-1;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current ~~unit~~ members of the ~~unit~~<sup>facility</sup> staff;
- h. Records of in-service inspections performed pursuant to these Technical Specifications;
- i. Records of Quality Assurance activities required by the QA Program;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings and results of reviews and audits performed by the Offsite Review and Investigative Function and the Onsite Review and Investigative Function;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.8 including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality;
- n. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed, and
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

ADMINISTRATIVE CONTROLS

OFFSITE DOSE CALCULATION MANUAL (ODCM) (Continued)

- 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 ~~Semiannual~~ 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.

**ATTACHMENT B-2**

**PROPOSED CHANGES TO APPENDIX A,  
TECHNICAL SPECIFICATIONS, OF FACILITY  
OPERATING LICENSES NPF-72 AND NPF-77,  
BRAIDWOOD STATION UNITS 1 & 2**

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                  XX  
                  1-4  
          3/4 11-1  
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## CHANGE SUMMARY

<u>Technical Specification</u>	<u>Change Description</u>	<u>Described in item #</u>
Index	Change "unit" to "facility"	4
Index	Change "Semiannual" to "Annual"	1
1.18	Delete "Semiannual"	1
3.11.1.4	Delete "Semiannual"	1
3.11.2.6.a	Delete "Semiannual"	1
6.1.1	Change "unit" to "facility"	4
6.1.2	Revise description of the Shift Engineer's responsibilities	3
6.2.1	Change "unit" to "facility"	4
6.2.2	Change "unit" to "facility" Change "Operator" to "Reactor Operator"	4
6.2.4	Revise description of Shift Technical Advisor; Delete description of specific STA work practices	2
Table 6.2-1	Replace table with one that is more consistent with the Standard Technical Specifications (titles, notes, and format)	4
6.3	Change "unit" to "facility" Replace specific titles with more generic titles	4
6.4	Change "unit" to "facility"	4
6.8.3	Correct spelling of "Specification"	4
6.8.3.b	Change "Operator" to "Reactor Operator"	4

## CHANGE SUMMARY (continued)

<u>Technical Specification</u>	<u>Change Description</u>	<u>Described in item #</u>
6.9.1.4	Change "unit" to "facility" Delete reference to initial report	4
6.9.1.6	Change "unit" to "facility"	4
6.9.1.7	Change the submittal frequency of the radiological effluent report from semiannual to annual. Due date changed to May 1.	1
6.9.10.2	Change "unit" to "facility"	4
6.14.1.c	Delete "Semiannual"	1

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## DEFINITIONS

### OFFSITE DOSE CALCULATION MANUAL

1.18 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Sections 6.8.4.e and f, and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and ~~Semiannual~~ Radioactive Effluent Release Reports required by Specification 6.9.1.6 and 6.9.1.7.

### OPERABLE - OPERABILITY

1.19 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

### OPERATING LIMITS REPORT

1.19.a The OPERATING LIMITS REPORT is the unit-specific document that provides operating limits for the current operating reload cycle. These cycle-specific operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.9. Plant Operation within these operating limits is addressed in individual specifications.

### OPERATIONAL MODE - MODE

1.20 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2.

### PHYSICS TESTS

1.21 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the core and related instrumentation: (1) described in Chapter 14.0 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

### PRESSURE BOUNDARY LEAKAGE

1.22 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a nonisolable fault in a Reactor Coolant System component body, pipe wall, or vessel wall.

### 3/4.11 RADIOACTIVE EFFLUENTS

#### 3/4.11.1 LIQUID EFFLUENTS

##### LIQUID HOLDUP TANKS

#### LIMITING CONDITION FOR OPERATION

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3.11.1.1 Deleted

3.11.1.2 Deleted

3.11.1.3 Deleted

3.11.1.4 The quantity of radioactive material, excluding tritium and dissolved or entrained noble gases, contained in any outside tanks shall be limited to the following:

- a. Primary Water Storage Tank  $\leq$  2000 Curies, and
- b. Outside Temporary Tank  $\leq$  10 Curies.

APPLICABILITY: At all times.

#### ACTION:

- a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank contents to within the limit, and describe the events leading to this condition in the next ~~Semi-annual~~ Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.11.1.4 The quantity of radioactive material contained in each of the above tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

## RADIOACTIVE EFFLUENTS

### GAS DECAY TANKS

#### LIMITING CONDITION FOR OPERATION

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3.11.2.6 The quantity of radioactivity contained in each gas decay tank shall be limited to less than or equal to  $5 \times 10^4$  Curies of noble gases (considered as Xe-133 equivalent).

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any gas decay tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank and, within 48 hours, reduce the tank contents to within the limit, and describe the events leading to this condition in the next ~~Semiannual~~ Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

---

4.11.2.6 The quantity of radioactive material contained in each gas decay tank shall be determined to be within the above limit at least once per 24 hours when radioactive materials are being added to the tank.

## ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Station Manager, Braidwood Station, shall be responsible for overall <sup>facility</sup> ~~unit~~ operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Engineer (~~or during his absence from the control room, a designated individual~~) shall be responsible for ~~the control room command function. A management directive to this effect, signed by the Vice President PWR Operations shall be reissued to all station personnel on an annual basis.~~ <sup>directing the control room command function and the daily operations of the facility.</sup>

### 6.2 ORGANIZATION

#### 6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for <sup>facility</sup> ~~unit~~ operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- 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. These requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activities; Section 6 Interdepartmental Relationships.
- b. The Station Manager shall be responsible for overall <sup>facility</sup> ~~unit~~ safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Senior Vice President-Nuclear Operations shall have corporate responsibility for overall plant nuclear safety 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 nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### FACILITY

#### 6.2.2 UNIT STAFF

The <sup>facility</sup> ~~unit~~ staff shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1; and



## ADMINISTRATIVE CONTROLS

### UNIT STAFF (Continued)

- b. At least one licensed <sup>Reactor</sup>Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior <sup>Reactor</sup>Operator shall be in the control room;
- c. A Radiation Protection Technician,\* qualified in radiation protection procedures, shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS <sup>Reactor</sup> shall be observed and directly supervised by either a licensed Senior <sup>Reactor</sup>Operator or licensed Senior <sup>Reactor</sup>Operator Limited to Fuel Handling who has no other concurrent <sup>Reactor</sup>responsibilities during this operation;
- e. Administrative procedures shall <sup>facility</sup> be developed and implemented to limit the working hours of <sup>Reactor</sup>unit staff who perform safety-related functions; e.g., licensed Senior <sup>Reactor</sup>Operators, licensed <sup>Reactor</sup>Operators, health physics personnel, equipment <sup>Reactor</sup>operators, and key <sup>Reactor</sup>maintenance personnel.
- The amount of overtime worked by <sup>facility</sup>unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12);
- f. The Assistant Superintendent Operating shall hold a Senior <sup>Reactor</sup>Reactor Operator License.

### 6.2.3 ONSITE NUCLEAR SAFETY GROUP (ONSG)

#### FUNCTION

6.2.3.1 The ONSG serves as an independent safety engineering group and shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving plant safety. The ONSG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Safety Assessment Manager, and the Station Manager, Braidwood Station.

#### COMPOSITION

6.2.3.2 The ONSG shall be composed of at least three dedicated, full-time engineers located on site.

\*The Radiation Protection Technician may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

ADMINISTRATIVE CONTROLS

6.2.3 ONSITE NUCLEAR SAFETY GROUP (ONSG) (Continued)

RESPONSIBILITIES

6.2.3.3 The ONSG shall be responsible for maintaining surveillance of plant activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ONSG shall be prepared, maintained, and forwarded each calendar month to the Safety Assessment Manager, and the Station Manager, Braidwood Station.

6.2.4 SHIFT TECHNICAL ADVISOR

The Station Control Room Engineer (SCRE) may serve as the Shift Technical Advisor (STA) during abnormal operating or accident conditions. During these conditions the SCRE or other on duty STA shall provide technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering and plant analysis with regard to the safe operation of the unit.

Engineer

facility

advisory

\*Not responsible for sign-off function.

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION		
	BOTH UNITS IN MODE 1, 2, 3, OR 4	BOTH UNITS IN MODE 5 OR 6 OR DEFUELED	ONE UNIT IN MODE 1, 2, 3 OR 4 AND ONE UNIT IN MODE 5 OR 6 OR DEFUELED
SE	1	1	1
SF	1	None##	1
RO	3#	2#	3#
AO	3#	3#	3#
STA or SCRE	1	None	1

- SE - Shift Supervisor (Shift Engineer) with a Senior Operator license
- SF - Shift Foreman with a Senior Operator license
- RO - Individual with an Operator license
- AO - Auxiliary Operator
- STA - Shift Technical Advisor
- SCRE - Station Control Room Engineer with a Senior Operator License

The Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the control room while the Unit is in MODE 1, 2, 3 or 4, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the Unit is in MODE 5 or 6, an individual with a valid Operator license shall be designated to assume the control room command function.

#At least one of the required individuals must be assigned to the designated position for each unit.

##At least one licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling must be present during Core Alterations on either unit, who has no other concurrent responsibilities.

*Replace with Insert "A"*

# INSERT "A"

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION<sup>(a)(f)</sup>

POSITION <sup>(b)</sup>	MINIMUM CREW NUMBER		
	EACH UNIT IN MODE 1, 2, 3, OR 4	ONE UNIT IN MODE 1, 2, 3, OR 4, AND ONE UNIT IN MODE 5, 6, OR DEFUELED	EACH UNIT IN MODE 5, 6, OR DEFUELED
SE	1	1	1
SRO	1	1	None <sup>(e)</sup>
RO <sup>(d)</sup>	3	3	2
AO <sup>(d)</sup>	3	3	3
STA <sup>(c)</sup>	1	1	None

- (a) The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for not more than 2 hours to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crew member being late or absent.
- (b) Table Notation:
- SE - Shift Engineer with a Senior Reactor Operator license
  - SRO - Individual with a Senior Reactor Operator license
  - RO - Individual with a Reactor Operator license or a Senior Reactor Operator license
  - AO - Auxiliary Operator
  - STA - Shift Technical Advisor
- (c) The STA position may be filled by any individual who meets the Commission Policy Statement on Engineering Expertise on Shift.
- (d) At least one of the required individuals must be assigned to the designated position for each unit.
- (e) At least one licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities must be present during CORE ALTERATIONS on either unit.
- (f) With either Unit in MODE 1, 2, 3, or 4, an individual with a Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. With both units in MODE 5, 6, or defueled, an individual with a SRO license or Reactor Operator license shall be designated to assume the control room command function.

## ADMINISTRATIVE CONTROLS

### 6.2.4 SHIFT TECHNICAL ADVISOR (Continued)

To assure capability for performance of all STA functions:

- (1) The shift foreman (SRO) shall participate in the SCRE shift relief turnover.
- (2) During the shift, the shift engineer and the shift foreman (SRO) shall be made aware of any significant changes in plant status in a timely manner by the SCRE.
- (3) During the shift, the shift engineer and the shift foreman (SRO) shall remain abreast of the current plant status. The shift foreman (SRO) shall return to the control room two or three times per shift, where practicable, to confer with the SCRE regarding plant status. Where not practicable to return to the control room, the shift foreman (SRO) shall periodically check with the SCRE for a plant status update. The shift foreman (SRO) shall not abandon duties original to reactor operation, unless specifically ordered by the shift engineer.

Facility

### 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the <sup>Facility</sup> ~~unit~~ staff shall <sup>a supervisor in</sup> meet or exceed the minimum qualifications of ANSI N18.1-1971, except for the Health Physics ~~Supervisor or Lead~~ <sup>Department</sup> Health Physicist, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, for a Radiation Protection Manager.

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the <sup>Facility</sup> ~~unit~~ staff shall be maintained under the direction of the Production Training Department and shall meet or exceed the requirements and recommendations of Section 5 of ANSI/ANS 3.1-1978, and shall include familiarization with relevant industry operational experience from the program managed by Quality Programs and Assessment.

### 6.5 REVIEW INVESTIGATION AND AUDIT

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.

## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

- f. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.10.
- g. Editorial and Typographical changes shall be made in accordance with station procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 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 holds a Senior Operator license on the Unit affected; and
- c. The change is documented, reviewed and approved in accordance with Specification 6.8.2 within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Reactor Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation portion of the Containment Spray System, Safety Injection System, Chemical and Volume Control System, and RHR System. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements, and
- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables,

## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

- 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.

### 6.9 REPORTING REQUIREMENTS

#### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the NRC Regional Office unless otherwise noted.

#### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The Startup Report shall address each of the tests identified in the Final Safety Analysis Report FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

#### ANNUAL REPORTS

6.9.1.4 Annual Reports covering the activities of the <sup>facility</sup> ~~unit~~ as described below for the previous calendar year shall be submitted prior to March 1 of each year. ~~The initial report shall be submitted prior to March 1 of the year following initial criticality.~~

ADMINISTRATIVE CONTROLS

REPORTING REQUIREMENTS (Continued)

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT\*

*Facility* 6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the ~~unit~~ during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT\*\*

*A Facility* 6.9.1.7 ~~The Semiannual Radioactive Effluent Release Report~~ covering the operation of the ~~unit~~ during the previous ~~6 months of operation~~ shall be submitted ~~within 60 days after January 1 and July 1 of each year.~~ *year* *Prior to* The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the ~~unit~~. *May 1* The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

MONTHLY OPERATING REPORT

*Facility* 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or RCS safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the NRC Regional Office, no later than the 15th of each month following the calendar month covered by the report.

OPERATING LIMITS REPORT

6.9.1.9 Operating limits shall be established and documented in the OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle. The analytical methods used to determine the operating limits shall be those previously reviewed and approved by the NRC in Topical Reports: 1) WCAP 9272-P-A "Westinghouse Reload Safety Evaluations Methodology" dated July 1985, 2) WCAP-8385 "Power Distribution Control and Load Following Procedures" dated September 1974, 3) NFSR-0016 "Benchmark of PWR Nuclear Design Methods" dated July 1983, and/or 4) NFSR-0081 "Benchmark of PWR Nuclear Design Methods Using the PHOENIX-P and ANC Computer Codes" dated July 1990. The operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met. The OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

\*A single submittal may be made for a multi-unit station.

\*\*A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.



## ADMINISTRATIVE CONTROLS

### RECORD RETENTION (Continued)

- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those <sup>facility</sup> ~~unit~~ components identified in Table 5.7-1;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the ~~unit~~ staff;
- h. <sup>facility</sup> Records of in-service inspections performed pursuant to these Technical Specifications;
- i. Records of Quality Assurance activities required by the QA Program;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings and results of reviews and audits performed by the Offsite Review and Investigative Function and the Onsite Review and Investigative Function;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.8 including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality;
- n. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed, and
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

### 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

ADMINISTRATIVE CONTROLS

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OFFSITE DOSE CALCULATION MANUAL (ODCM) (Continued)

- 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 ~~Semiannual~~ 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.

## ATTACHMENT C

### EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10CFR50.92(c), a proposed amendment to an operating license involves no significant hazards if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed amendment makes several changes to the Administrative Controls in Section 6 of Technical Specifications for Byron and Braidwood stations. The proposed changes include (1) a change to the submittal frequency of the Radiological Effluent Release Report, (2) a revision to the Shift Technical Advisor description, (3) clarification of the Shift Engineer's responsibilities, and (4) editorial changes. The references to the Semiannual Radiological Effluent Release Report are also revised in other sections of Technical Specifications.

- A. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to Section 6 of Technical Specifications do not affect any accident initiators or precursors and do not change or alter the design assumptions for the systems or components used to mitigate the consequences of an accident.

The proposed changes are administrative in nature and provide clarification. These changes provide consistency with station procedures, programs, the Code of Federal Regulations, other Technical Specifications, and Standard Technical Specifications. These changes do not impact any accident previously evaluated in the UFSAR.

- B. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not affect the design or operation of any system, structure, or component in the plant. There are no changes to parameters governing plant operation; no new or different type of equipment will be installed. The proposed changes are considered to be administrative changes. All responsibilities described in Technical Specifications for management activities will continue to be performed by qualified individuals.

- C. The proposed changes do not involve a significant reduction in a margin of safety.

The proposed changes do not affect the margin of safety for any Technical Specification. The initial conditions and methodologies used in the accident analyses remain unchanged, therefore, accident analysis results are not impacted.

The proposed changes are administrative in nature and have no impact on the margin of safety of any Technical Specification. They do not affect any plant safety parameters or setpoints. The descriptions for the Shift Technical Advisor and Shift Engineer are clarified, however, include no reduction to their responsibilities.

Based on the above evaluation, Commonwealth Edison has concluded that these changes do not involve significant hazards considerations.

## ATTACHMENT D

### ENVIRONMENTAL ASSESSMENT

Commonwealth Edison Company has evaluated the proposed amendment against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. ComEd has determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10CFR51.22(c)(10). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10CFR50, and it changes administrative procedures or requirements.