NOTE! Response with INITIAL Pkg.

SEP 17 1993

Docket No. 50-237
Docket No. 50-249

Commonwealth Edison Company
ATTN: Mr. L. O. DelGeorge
Vice President
Nuclear Oversight and
Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 300
Downers Grove, IL 60515

Dear Mr. DelGeorge:

SUBJECT: EXAMINATION REPORT (REQUALIFICATION, REQUALIFICATION RETAKE AND INITIAL LICENSE EXAMINATIONS)

During the weeks of July 26 and August 2, 1993, Mr. D. McNeil and others of this office administered requalification examinations and initial license examinations to employees of your organization who operate and handle fuel at your Dresden Nuclear Power Station. On August 4, 1993, a retake examination (dynamic simulator portion) was administered to one of your operators who failed the requalification examination administered on September 9, 1992. At the conclusion of the examinations, preliminary findings were discussed with those members of your staff identified in the enclosed report.

The Dresden Station requalification training program was determined to be effective and has been assigned an overall program rating of satisfactory in accordance with the criteria of NUREG-1021, Revision 7, Operator Licensing Examiner Standards, ES-601. For the individual with unsatisfactory results, the facility should take corrective action as required by its approved requalification program.

The Dresden Station operator requalification training program shows improvement when compared with previous years. The requalification examination material submitted has also improved. The examination team was able to use the presented material with only minor modifications. The station operators appeared to be more familiar with the Dresden Emergency Operating Procedures (DEOPs) than during previous examinations and showed marked improvement in their communication skills.

However, weaknesses were noted in the initial exam process as described in the following three paragraphs.

During the initial license exam, a majority of candidates were judged to be weak or unsatisfactory in the area of radiation release. A significant item of concern in this area is the execution of the Dresden Emergency Operating Procedures (DEOPs) when high radiation conditions exist in the reactor building. Six crews were given a dynamic simulator scenario with high radiation levels in the reactor building caused by a small steam leak with core damage. The DEOPs require the operators to emergency depressurize the reactor if radiation levels in the Emergency Core Cooling System (ECCS) rooms exceed 2500 mr/hr. However, six of the eight control room ECCS room radiation monitors have instrument scales that cannot read 2500 mr/hr. Also, the scenario prevented operators from entering the Reactor Building (due to high radiation levels at the building entrance) and obtaining radiation levels locally. As a result, three crews took action to emergency depressurize the reactor while three crews did not take action to emergency depressurize the reactor under the same scenario conditions. The conflicting responses to the same scenario conditions indicate either a failure of the DEOPs to provide adequate guidance or an inadequate ranging of specific control room radiation monitors as indicated by the inability of operators to acquire data needed for DEOP implementation. We request that you respond to this issue within 30 days of the date of this letter.

During the administration of the initial license examination, seven candidates were given a Job Performance Measure (JPM) requiring them to recognize and take the corrective actions for a mispositioned control rod. All candidates correctly identified the mispositioned control rod. However, two Reactor Operator candidates initiated corrective actions that were not in accordance with Dresden Station operating procedures. This is of concern because Dresden Station has demonstrated a history of improper response to mispositioned control rods. Because 2 of 7 candidates responded incorrectly, it appears that corrective actions taken to train operators in responding to mispositioned control rods have not been totally effective. We also request that you respond to this issue within 30 days of the date of this letter.

During the administration of the initial license examination, multiple occurrences of poor performance by Radiation Protection personnel were noted. A description of the occurrences can be found in Enclosure 1, Report Details, Section 4.b. Although no written response is necessary for this item, management attention should be directed to this area.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room.

Should you have any questions concerning this examination, please contact us.

Sincerely,

Original signed by William L. Forney

William L. Forney, Acting Director
Division of Reactor Safety

Enclosures:
1. Examination Report
   No. 50-237/OL-93-01
2. Requalification Program
   Evaluation Report

cc w/enclosures:
M. D. Lyster, Site Vice President
Gary F. Spedl, Station Manager
J. Shields, Regulatory Assurance
  Supervisor
D. Farrar, Nuclear Regulatory
  Services Manager
R. Weidner, Plant Training Manager
OC/LFDCB
Resident Inspectors-LaSalle,
  Dresden, Quad Cities
Richard Hubbard
J. W. McCaffrey, Chief, Public
  Utilities Division
Robert Newmann, Office of Public
  Counsel, State of Illinois Center
State Liaison Officer
Chairman, Illinois Commerce
  Commission
J. B. Martin, RIII
H. J. Miller, RIII
T. O. Martin, RIII
J. E. Dyer, NRR
M. J. Jordan, RIII
C. D. Pederson, RIII
S. Stasek, SRI, Davis-Besse
J. F. Stang Jr., LPM, NRR
G. Buckley, PNL
M. Mitchell, PNL
bcc w/enclosures: PUBLIC - IE42

				Yes		
RIII	RIII	RIII	RIII	RIII	RIII	RIII
McNeil/cg/jk	Jordan	Hiland	B. Burgess	J. M-Barger	Ring	Forney
9/15/93	9/16/93	9/16/93	9/17/93	9/15/93	9/16/93	9/17/93

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-237/OL-93-01

Docket Nos. 50-237; 50-249 Licenses No. DPR-29; No. DPR-27

Licensee: Commonwealth Edison Company
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Facility Name: Dresden Nuclear Power Station - Units 2 and 3

Examination Administered At: Dresden Nuclear Power Station

Examination Conducted: Weeks of July 26 and August 2, 1993

Examiners: C. Zelig, USNRC
G. Buckley, Pacific Northwest Laboratories
M. Mitchell, Pacific Northwest Laboratories

Chief Examiner: Derek R. McNeil 9/15/93
D. McNeil Date

Approved By: M J Jordan 9/16/93
M. J. Jordan, Chief Date
Operator Licensing Section 1

Examination Summary

Examinations administered during the weeks of July 26 and August 2, 1993 (Report No. 50-237/OL-93-01(DRS))
Written and operating requalification examinations were administered to six Senior Reactor Operators (SROs), one SRO Limited to Fuel Handling (LSRO) and three Reactor Operators (ROs). One SRO was administered a requalification retake examination (dynamic simulator portion only). Three crews, made up of staff and operating personnel, were evaluated on the simulator portion of the NRC examination. Two SROs and three ROs who had been evaluated during previous examinations participated during the dynamic simulator scenarios to complete the composition of the three crews.

Written and operating examinations were given to nine (9) individuals applying for RO licenses and to six (6) individuals applying for SRO licenses. None of the individuals applying for SRO licenses has been previously licensed at Dresden Station.

Requal Retake Examination Results:

The individual who took the dynamic simulator requalification re-take examination was assessed as satisfactory.

Requal Examination Results:

There was one individual failure in the Job Performance Measures (JPMs) portion of the examination. There were no individual failures on the written examination and no individual failures on the dynamic simulator portion of the NRC requalification examination. Based on the results of the examination and in accordance with the criteria of NUREG-1021, Revision 7, Operator Licensing Examiner Standards, ES-601, D.2.a, the Dresden Requalification Training Program is determined to be satisfactory.

Initial Licensed Operator Examination Results:

All individuals taking the Initial Licensed Operator Examinations (RO and SRO) passed all portions of their respective examinations and have been issued operator licenses.

The following is a summary of the strengths and weaknesses noted during the performance of these examinations.

STRENGTHS/WEAKNESSES:

Strengths:

- Pre-examination review of the initial license written examination. (See Section 3.a.1)
- Material submitted for the requalification examination. (See Section 3, 3.c.1)
- Control room communications during the dynamic simulator scenarios. (See Section 3.c.1)
- Use of and compliance with operating procedures during both the initial and requalification examinations. (See Section 3.b.1, 3.c.1)

Weaknesses:

- Response to radioactive release conditions as indicated:
    1. Identification of entry conditions for Emergency Operating Procedures. (See Section 3.a.2)
    2. Calculation of off-site radioactive release rate. (See Section 3.b.2)
    3. Identification of a major radiological release and the need for emergency depressurization during dynamic simulator scenario conditions. (See Section 3.c.2)

- Location of Traversing In-Core Probe (TIP) system guillotine shear valve key. (See Section 3.b.2)
- Plant annunciator response and diagnosis. (See Section 3.c.2)
- Electric panel (902(3)-8) operations. (See Section 3.c.2)
- Radiation protection department performance. (See Section 4.b)
- Improper response to a mispositioned control rod. (See Section 3.b.2)

REPORT DETAILS

1. Examiners

*D. McNeil, Chief Examiner, NRC, Region III
C. Zelig, Examiner, NRC, Region III
G. Buckley, Pacific Northwest Laboratories (PNL)
*M. Mitchell, PNL

2. Persons Contacted

Facility

*J. Kotowski, Production Superintendent
*M. Korchynsky, Senior Operating Engineer
*R. Weidner, Training Supervisor
*D. Shavey, Operations Training Supervisor
*J. Shields, Regulatory Assurance Supervisor
*K. Rach, BWR Operations Training Supervisor
*R. Sitts, LO Requal Administrator
D. Zehrung, Simulator Instructor
J. Heck, Instructor

U. S. Nuclear Regulatory Commission (NRC)

*M. Leach, Senior Resident Inspector, Dresden

*Denotes those present at the exit meeting on August 5, 1993.

3. Training Program Observations

The trainers appeared to be knowledgeable and courteous throughout the examination process. They put in extra time when necessary and maintained a professional attitude throughout the examination.

Material provided to support the requalification examination, including proposed examinations, was much improved when compared to the material provided by the Dresden Training Department for previous requalification examinations. The written examinations, JPMs and dynamic simulator scenarios required only minor changes to make them acceptable for an NRC administered examination.

The requalification crews appeared to be better prepared than previous crews evaluated during NRC examinations. Communications was improved over previous examinations.

The following information is provided for evaluation by the licensee via their SAT based training program. No response is required.

a. Written Examination

The Category B requalification written examination was given in a standard classroom environment with references available. The SRO examination had 39 questions while the RO examination had 38 questions. All candidates had completed the examination before the allowed 2 hours had elapsed. The Category A examination was given in the simulator. Both the RO and SRO examinations had 15 questions on the examination. All operators completed the examination within the allowed 1 hour.

The initial license examination was a standard 100 question examination as prescribed by NUREG 1021, Revision 7.

1. Strengths

The pre-exam review for the initial license written examination was noted as a strength. The review resulted in numerous pre-exam comments and no post exam comments.

2. Weaknesses

Grading of the initial examination revealed three generic weaknesses. A majority of the operators failed to correctly identify:

(a) the indications of an off-gas system fire;

(b) the response of the Standby Gas Treatment system to low flow conditions following a manual start; and

(c) entry conditions for DEOP 300-2, Radioactive Release.

b. Job Performance Measures (JPM)

All operators received 100% scores on the requalification JPMs except one who received a 60%. The one operator's performance was judged to be unsatisfactory. Each operator performed a total of five JPMs during their requalification examination.

The requalification examination JPMs performed in the plant were:

(1) Adjust recirculation flow using local scoop tube operation.

(2) Remove fuses for a stuck open relief valve.

(3) Perform Source Range Monitor (SRM) "not in operate" functional test.

(4) Lockout reactor recirculation pump using alternate method.

(5) Bypass high torus water level High Pressure Core Injection (HPCI) suction transfer with reactor building inaccessible.

(6) Place Diesel Generator (DG) in standby after surveillance testing.

The Requalification examination JPMs performed in the control room/simulator were:

(1) Parallel Bus 24-1 to Bus 34-1.

(2) Low Pressure Coolant Injection (LPCI) Pump Operability Test (Faulted).

(3) Core Spray Pump Operability Test (Faulted).

(4) Change-over Main Feedwater Regulating Valves.

All operators were judged to be satisfactory in performing the initial license JPMs. Each operator performed a total of ten JPMs during their initial examination.

The initial examination JPMs performed in the simulator/control room were:

(1) Reopen Main Steam Isolation Valves (MSIVs) with an Isolation Signal Present.

(2) Transfer Auxiliary Power from Transformer (TR) 21 to TR 22.

(3) Startup of Shutdown Cooling.

(4) Manual Scram Circuit Test.

(5) Control Reactor Pressure Using HPCI.

(6) Start Torus Cooling w/o an Injection Signal Present.

(7) Respond to a Mispositioned Control Rod.

(8) Startup of a Second Reactor Recirculation Pump.

(9) Lowering Unit 2 Torus Water Level.

(10) Partial Closure Operability Test of Main Steam Isolation Valves (MSIVs)

(11) LPCI Pump Operability Test (Faulted).

(12) TIP System Operation.

(13) Change-Over Main Feedwater Regulating Valves (MFRVs).

(14) Start Standby Gas Treatment (SBGT).

The initial examination JPMs performed in the plant were:

(1) Transfer of Control Rod Drive (CRD) Flow Control Valves.

(2) Lineup Diesel Fire Pump to Inject into Unit 2 Reactor Pressure Vessel (RPV).

(3) Transfer Reactor Protection System (RPS) Bus to the Normal Power Supply.

(4) Local Manual Start of the SBGTs.

(5) Alternate Injection from Standby Liquid Control SBC Test Tank.

(6) Unit 2/3 Instrument Air Cross-Connect Operation.

Strengths:

1. Operators were familiar with procedures and were able to promptly retrieve and execute the correct procedure in nearly all instances.

   Operators were familiar with component locations in the plant. They were able to rapidly proceed to equipment and simulate operation of the equipment as directed by procedures.

2. Weaknesses:

   Initial license candidates sometimes failed to retrieve materials required to execute JPMs before they went to the job site. This required the candidate to go back to the control room to obtain keys, DEOP equipment, etc., to complete the JPM.

   Some initial license candidates were not familiar with the new key control system being instituted, especially when confronted with obtaining keys for Unit 3. New keys for Unit 3 are in place in the key cabinet, but the padlocks on Unit 3 locked valves still use the generic key found on all unit attendant key rings. This caused confusion to some candidates.

   While performing the JPM to respond to a misposition control rod, two reactor operator initial license candidates failed to take the proper corrective action when they discovered a mispositioned control rod. Candidates were required to detect a mispositioned control rod, reduce plant power by 50 MWe and notify Nuclear Engineering. One candidate discovered the mispositioned control rod and immediately inserted the control rod to notch 00 (full in). The candidate then opened the procedure and realized the action he had taken was incorrect. The second candidate discovered the mispositioned control rod, retrieved the correct procedure and then improperly interpreted the actions to be taken. The procedure allows the operator to restore the control rod to the target position if the rod is mispositioned by one even notch. The target position for the mispositioned control rod was notch 08. The control rod was at notch 04. This is two even notches from the target position. The candidate restored the control rod to notch 08.

All the initial SRO candidates were unable to calculate a radioactivity release rate using Dresden EPIP 0150-05, Rev 01. The SROs were given a specified set of conditions and asked to calculate a release rate, then classify the event based on the release rate. The expected result was the operators would find the release rate to be 2.8 E6 microcuries per second and declare an Unusual Event. Six out of six candidates given the JPM were unable to correctly calculate the release rate. Their calculations caused them to respond with Emergency Action Levels, from "no declaration" to "General Emergency." Although all SRO candidates failed this JPM, none of the candidates failed more than 2 of 10 JPMs and hence all passed the exam.

While observing JPMs with the LSRO, it was noted that the refuel grapple did not work. The LSRO then struck the dummy bundle with the grapple to break the stuck parts loose. He indicated the grapple had been recently painted. Moving parts were apparently painted and prevented the grapple from operating. This appears to be a maintenance problem and has been referred to the NRC Senior Resident Inspector.

While simulating the performance of a TIP trace, candidates were asked where the key is located for the guillotine (shear) valves in the TIP system. The operators responded that the SCRE had the key. When the SCRE was asked where the key was located, he responded that the Shift Engineer (SE) had the key. The SE indicated he did not have the key. It took approximately 10 minutes to finally locate the key for these valves.

c. <u>Simulator Scenarios</u>

All operators were graded as satisfactory on performance in the dynamic simulator scenarios for the requalification examination.

The SRO who was given a requalification retake examination was also judged to be satisfactory. All simulator scenarios were completed in one day, therefore, only two scenarios were required.

Scenario 1 required the operators to respond to a Reactor Water Cleanup (RWCU) pressure regulator failure, a Recirculation pump runback and a Loss of Coolant Accident (LOCA) with a Loss of an Emergency Core Cooling System (ECCS) electrical bus.

Scenario 2 required the operators to respond to an Isolation Condenser tube leak, a Feedwater Heater Drain Line Break, a Loss of Transformer 22, simultaneous failure of 2 EMRVs (open) and a series of failures requiring the SRO to initiate Steam Cooling.

All operators were graded as satisfactory in the dynamic simulator scenarios for the initial examination. Simulator scenarios required two days. Three scenarios were used during the two days.

Scenario 1 was used on the first day and included: (1) a reactivity manipulation requiring candidates to raise reactor power using recirculation; (2) a normal evolution which required the operators to place the plant in Economic Generation Control (EGC); (3) a drifting control rod; (4) an LPRM failure; (5) a failure of the RWCU pressure controller; (6) a stuck open SRV; and (7) a total loss of high pressure feed/injection systems with an ATWS.

Scenario 2 was used on the second day and included: (1) a reactivity manipulation requiring candidates to raise reactor power using recirculation; (2) a normal evolution requiring operators to place the plant in EGC; (3) an APRM failure; (4) a spurious initiation of the isolation condenser; and (5) a loss of control air to the "A" FWRV; (6) a loss of main condenser vacuum; and (7) an ATWS.

Scenario 3 was used on both days and included: (1) a reactivity manipulation requiring the candidates to lower reactor power using recirculation; (2) a spurious start of the HPCI pump; (3) a failure of the recirculation pump "A" speed feedback signal; (4) a trip of CRD pump 2B; (5) a tube rupture on the Isolation Condenser; and (6) a large fuel failure.

1. <u>Strengths:</u>

   Communications were significantly improved during the requalification examination. They were closed loop, clear and accurate.

The scenarios submitted for the proposed requalification examination were of high quality and required only minor modifications to use them for the examination.

Operators consistently retrieved and executed the correct procedures for the conditions they were given. Operators were familiar with and rapidly went to the correct panel locations to find the indications they needed to operate systems with the exception being one of the weaknesses noted below concerning the 902(3)-8 panel.

The trainers assigned to assist the examination team for the initial license examination were well prepared and contributed to the success of the examination by providing realistic cues when required by the operators.

2. Weaknesses:

During the initial license examination, all six crews were presented with scenario #3 where a small steam line break occurred in the reactor building with a concurrent failure of the fuel cladding. During the scenario every crew sent a response team to obtain radiation levels in the Emergency Core Cooling System (ECCS) areas of the reactor building. The radiation levels were necessary because the DEOPs require the operators to Emergency Depressurize (ED) the reactor plant when two or more of the ECCS areas exceed 2500 mr/hr. The teams were necessary because six of eight of the ECCS room radiation monitors providing control room indication have an instrument scale with an upper limit of less than 2,500 mr/hr. As part of the scenario, the simulated Radiation Protection Supervisor on the team reported back to the control room that radiation levels at the Reactor Building air lock door were 1000 mr/hr, that he and his team had withdrawn to a safe location and would not enter the reactor building because of the high radiation levels. Three of the initial license simulator crews had experienced SROs from operations or training departments directing DEOP actions during the scenarios. The remaining three crews had Instant SRO candidates directing DEOP actions. All experienced SROs took immediate action to ED, indicating that if the radiation levels were 1000 mr/hr at the reactor building door, then they had to be exceeding the 2500 mr/hr limit given in the DEOPs for the ECCS rooms. None of the Instant SROs took action to ED basing their decision on the fact that they had no positive proof that 2500 mr/hr existed in the ECCS rooms. This is defined as a weakness because: (1) the two groups took diverging DEOP actions when presented with the same scenario conditions and (2) there is no clearly defined method for obtaining ECCS room radiation levels under these conditions without endangering personnel due to the high radiation levels or the high temperatures from the steam leak. There is also no method of determining ECCS room water levels under adverse environmental/ radiological conditions.

It was noted that during the requalification examination that operations on the 902(3)-8 panel were weak. Each crew appeared to have one individual on the crew that had good knowledge of operations on this panel. If that individual was engaged in responding to other events, the other operator doing electrical line-ups on the 902(3)-8 panel had difficulties.

The simulator had some identified software problems which caused certain annunciators to repeatedly alarm, making it impossible to silence the annunciators during certain scenarios. This provided negative training in that annunciators were not being silenced in some cases. During the requalification scenarios, one crew seldom acknowledged annunciators and simply raised their voices to communicate over the noise of the alarms. The other two requal crews silenced the alarms when they could but at times allowed them to continue to alarm.

Some annunciators are not being properly diagnosed by operators. This may be a result of the annunciator problem noted above in that operators are ignoring annunciators because of the inability to acknowledge and silence alarms. In two separate cases during the initial license examination SROs failed to diagnose a steam leak in the reactor building when annunciators clearly indicated there was a leak in the reactor building.

4. <u>Operations, Security, Rad Protection, Other</u>

a. <u>Strengths:</u>

Training, Operations, and Security were all professional in their dealings with the examination team. The examination team was able to quickly process through the gate house and into the plant. The examination team was able to quickly obtain all materials needed for efficient administration of the examination.

b. <u>Weaknesses:</u>

On two separate occasions, radiation protection personnel at the dosimetry issue desk were noted to be reading material that was not job related.

On one occasion, at 11:55 a.m., two of the candidates with their examiners called radiation protection for assistance at the frisking desk to get out of the Radiation Control Area (RCA) and were told, "I've still got 5 minutes of lunch left." The candidates and examiners had to wait at the frisk station inside the RCA for the five minutes before the rad tech would come to assist them. The station's policy would not allow the individuals to frisk out their own materials. This is not consistent with the ALARA program.

On a separate occasion one examiner was issued a TLD at the TLD issue counter. He returned the TLD to the counter at the end of the day and told the technician at the counter he would be back later during the week and would need the TLD again. Two days later he returned to the TLD issue counter and was told they could not find his old TLD and they would issue him a new one. It was later discovered that the original TLD had been moved to the security gate house where a security guard had given it to another examiner. The second examiner discovered the error because the TLD still had the first examiner's name written on it. The above are examples of poor performance in the rad-protection/health physics area.

In the Operations department, some procedural problems were identified. The procedure used to shift Control Rod Drive flow control valves has many minor errors. There are typos and errors such as the procedure calling for a switch to be moved to "HAND" when the actual position on the switch in the plant is labeled "MANUAL." The procedure for local manual operations of the Standby Gas Treatment System (SBGT) is located in the procedure for local manual operation of the HPCI system. This caused some confusion for initial license candidates as they were not sure where to find the procedure for local operation of the SBGT.

While performing the procedure for local operation of the SBGT, it was noted that the biological shield placed in front of the SBGT Train "A" local relay panel is so close to the panel, it prohibits local emergency operation of the SBGT "A" system. This item has been turned over to the NRC Senior Resident Inspector for further follow-up.

Plant housekeeping was satisfactory. In some areas housekeeping could be improved. For example, boron crystals have built up on the Standby Liquid Control System pumps.

5. Simulator Observations:

a. Simulator discrepancies were identified. The training department was aware of these discrepancies and had already issued simulator deficiency reports for the noted deficiencies.

6. Exit Meeting

An exit meeting with the Dresden Nuclear Generating Plant management was held at the Dresden training offices on August 5, 1993. Those attending the meeting are listed in Section 2 of this report. The following items were discussed during the exit meeting:

- Strengths and weaknesses noted in this report.

- The general observations relating to the plant noted in Section 4.

ENCLOSURE 2

REQUALIFICATION PROGRAM EVALUATION REPORT

Facility: Dresden Nuclear Power Station

Examiners: D. McNeil, Chief Examiner
C. Zelig, Region III
G. Buckley, Pacific Northwest Laboratories (PNL)
M. Mitchell, PNL

Dates of Evaluation: July 26 - August 5, 1993

Areas Evaluated: X Written X Oral X Simulator

Examination Results:

	RO Pass/Fail	SRO Pass/Fail	Total Pass/Fail	Evaluation (S or U)
Written Examination	3/0	7/0	10/0	S
Operating Examination Oral	3/0	6/1	9/1	S
Simulator	6/0	9/0	15/0	S

Evaluation of facility written examination grading S

Crew Examination Results:

	Crew 1 Pass/Fail	Crew 2 Pass/Fail	Crew 3 Pass/Fail	Evaluation (S or U)
Operating Examination	PASS	PASS	PASS	S

Overall Program Evaluation

Satisfactory

Submitted:
D. McNeil
Examiner
9/15/93

Forwarded:
M. Jordan
Section Chief
9/15/93

Approved:
M. Ring
Branch Chief
9/16/93