



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 30, 1992

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Information Requested in
Examination Report 50-237/OL-92-01
NRC Dockets Numbers 50-237 and 50-249

Reference: G. C. Wright letter to C. Reed dated August 31, 1992,
transmitting Examination Report 50-237/OL-92-01

The reference letter transmitted the results of the license operator exam conducted at Dresden Station July 10 through July 17, 1992. A concern was identified regarding the expected operator knowledge of administrative topics. The attachment provides the requested response to this issue.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

Sincerely,

T. J. Kovach
Nuclear Licensing Manager

Attachment

cc: A. B. Davis, Regional Administrator - Region III
B. L. Siegel, Project Manager, NRR
W. G. Rogers, Senior Resident Inspector, Dresden

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ATTACHMENT
RESPONSE TO EXAMINATION REPORT

50-237/OL-92-01

In order for operators to perform their job in a safe and error free manner, knowledge of Dresden Administrative Procedures (DAPs) is a necessary requirement. To ensure consistent utilization of procedures among operating personnel, guidance is provided on the use of procedures in DAP 7-2, "Conduct of Shift Operations." At Dresden Station, the use of DAPs as a reference during actual plant operations, when done in accordance with station policy and with consideration of the need for a prompt yet accurate response, is proper conduct and does not reflect negatively on the operator's competency or ability to operate the plant in a safe manner. Frequent reference to procedures, especially by newly licensed individuals, should be encouraged.

For the purpose of the license exam, as described in NUREG-1123 "Knowledge and Abilities (K/A) Catalog for Nuclear Power Plant Operators: Boiling Water Reactors," DAPs that impact the health and safety of the public are more significant and thus require a greater knowledge level than procedures that would have minimal impact on the health and safety of the public.

When training and testing operators on their knowledge of administrative procedures, Dresden considers impact on plant safety, immediacy of the action required, whether the task is familiar and routine or unexpected. Actions such as responding as a member of the fire brigade or using the public address system to make emergency announcements are the types of actions that should be performed without referencing procedures, and the individuals would be expected to know their actions required by the administrative procedures. However, a logging requirement, even though frequently performed, has no urgency and no impact on the plant or personnel safety; so, if the operator elected to check the administrative procedure to verify appropriate action is being taken, it would not impact plant operations.

Dresden Station acknowledges inappropriate challenges to several administrative procedure related questions during the operator exam preparation process and presenting insufficient information regarding the reason for the challenge. These challenges may have given the NRC the impression that Dresden Station had lowered its expectations regarding the knowledge level of administrative procedures.

Dresden's position concerning knowledge of administrative procedures for training and examining of license operators remains as follows:

- 1) Dresden Station understands that proper selection of administrative topics for the Initial License Examination is governed by 10 CFR 55.41, NUREG 1021, BR-0122, and NUREG 1123.
- 2) Dresden Station believes that the practice of suggesting alternative questions which more clearly demonstrate administrative knowledge and abilities relating to safe operation of the plant in a manner ensuring public health and safety does not in any way indicate that station management expects other than strict procedural compliance to DAPs or any lower standards of acceptable administrative knowledge. Rather it focuses on items of greater importance which the operators need to know from memory and which therefore demonstrate both competency and safety.
- 3) Dresden's Training Department will continue to train licensed candidates in accordance with the Licensed Operator Task List. Additionally, procedure revision training will be conducted on selected DAPs as needed for Initial and Requal students.

After reviewing Dresden's training program with representatives from the Corporate Production Training Department it was determined that the program is consistent with programs at other CECo stations.

In order to ensure training is being done on the appropriate topics, the DAPs will be reviewed to determine if any modification is required to the Licensed Operator Task List. Additionally, the Training Department Instruction (TDI) which describes the process to be followed for the Pre-NRC examination review, TDI-509, will be revised to include additional, more specific guidance on how to review and document challenges to the original questions. These actions will be completed by December 31, 1992.

To enhance overall awareness of administrative procedures, DAP awareness training was provided to members of the operating department. Additionally, operating personnel have been provided with a matrix of DAPs for which they are responsible.

Dresden Station remains committed to operating the plant in a safe and error free manner by ensuring that licensed operators maintain the proper level of procedural awareness to perform their job duties.