Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 15, 1993

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

Attention: Document Control Desk

SUBJECT: Requested Response to Weaknesses Identified in Licensed Operator Examination Report (Requalification, Requalification Retake and Initial License Examinations)
Inspection Report No. 50-237/OL-93-01,
NRC Docket Numbers 50-237 and 50-249

REFERENCE: W.L. Forney letter to L. O. DelGeorge, dated September 17, 1993, transmitting Examination Report 50-237/OL-93-01.

The information requested by the NRC regarding conflicting responses by operating crews during examination and the mispositioned control rod drive JPM failure of two of seven operators is provided below.

The weakness as identified in the inspections report are:

Operating crews had conflicting responses to the same scenario condition, indicating a failure of the Dresden Emergency Operating Procedures (DEOPs) to provide adequate guidance, or an inadequate ranging of specific control room radiation monitors.

Due to the fact that two of seven operators failed their JPM on a mispositioned control rod, the NRC believes that the corrective actions taken to train operators on control rod mispositioning, have not been totally effective.

With regards to first identified weakness, the procedural guidance provided by DEOP 300-1 and the Control Room instrumentation available to execute this procedure were reviewed and determined not to be the root cause for the failure of the three crews. The deficiency in the operator performance was a result of inadequate training provided during Initial License training (ILT).

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Specifically, the ILT did not address the expected operator response when parameter values required to execute DEOP 300-1 are unavailable. Three of the six crews performed the correct actions during examination. These crews had experienced SROs acting as Shift Engineer, who have actively participated in Licensed Operator Continuing training (LOCT). The LOCT adequately addresses the required actions when parameter values are unavailable. The three crews that did not respond correctly did not have acting Shift Engineers who have participated in LOCT. The changes required to correct this weakness are limited to the ILT program. These changes will be made prior to the conduct of the next initial license class DEOP module, which is currently scheduled for March 1994.

In response to the second identified weakness, a multi-disciplined team of Nuclear Station Operators, Shift Supervisors, Trainers, and Nuclear Engineers was formed to investigate the root causes for the recurring problem of improper response to mispositioned control rod events. This team was also charged with evaluating current operating practices, procedural adequacy, and training effectiveness. The conclusions reached are that although training had been provided to the trainees, the training was ineffective due to the inadequate procedural guidance which exists in procedures dealing with control rod movement. A temporary procedure change was initiated for DOS 300-1, "Control Rod Drive Exercising" and training was conducted prior to the next scheduled date of this surveillance. Procedures dealing with control rod movement will be revised to correct deficiencies, and training provided on these changes to all licensed operators, trainers, and Qualified Nuclear Engineers. The training department will ensure that the topic of "Control Rod Mispositioning" is adequately addressed in the 1994 annual examination cycle to determine the effectiveness of the training provided.

If your staff has any questions concerning this letter, please refer them to Sara Reece-Koenig, Regulatory Performance Administrator at (708) 663-7285.

Sincerely,

D. Farrar
Nuclear Regulatory Services Manager

cc: J. B. Martin, Regional Administrator Region III
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M. N. Leach, Senior Resident Inspector, Dresden

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