



Commonwealth Edison
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Downers Grove, Illinois 60515

April 07, 1994

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

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3 Response to Notice of Violation; Inspection Report 50-237/94004; 50-249/94004
NRC Docket Numbers 50-237 and 50-249

Reference: M. A. Ring letter to M. D. Lyster, dated March 08, 1994 transmitting Inspection Report 50-237/94004; 50-249/94004.

D. Farrar letter to Document Control Desk, dated December 3, 1993, transmitting CECO's Response to Notice of Violation transmitted with Inspection Report 50-237(249)/93024.

D. Farrar letter to Document Control Desk, dated December 15, 1993, transmitting CECO's clarification of Response to Notice of Violation transmitted with Inspection Report 50-237(249)/93024.

Enclosed is Commonwealth Edison Company's (CECO) response to the concerns identified in the cover letter which transmitted Inspection Report 50-237(249)/94004. The first concern regards an unresolved item related to the objective evaluation of each individual operator during Licensed Operator requalification training. The second concern regards a request for an explanation of additional corrective actions to be taken to prevent recurrence of a previous violation involving Licensed Operator medical qualification requirements (Violation 50-237/93024-01). This response is being submitted as requested in the referenced M. A. Ring letter.

If your staff has any questions concerning this letter, please refer them to Sara Reece-Koenig, Regulatory Performance Administrator at (708) 663-7250.

Sincerely,

D. Farrar
Nuclear Regulatory Services Manager

attachments

cc: J. B. Martin, Regional Administrator Region III
J. F. Stang, Project Manager, NRR
M. N. Leach, Senior Resident Inspector, Dresden

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ATTACHMENT
RESPONSE TO COVER LETTER CONCERNS
NRC INSPECTION REPORT
50-237/94004; 50-249/94004

UNRESOLVED ITEM: (237/94004-01)

Competency factors used for evaluating individual and crew performance during dynamic scenario examinations don't appear to be designed for evaluating individuals. Furthermore, the lack of objective grading criteria or established standards for individual evaluations made it uncertain that the individuals participating in the dynamic scenario examination were evaluated as described in 10 CFR Part 55.59(a)(2).

RESPONSE TO UNRESOLVED ITEM:

The annual requalification examinations conducted at Dresden Nuclear Power Station contain crew and individual evaluations. The facility examination team consists of two evaluators assigned to evaluate individual performance, and a senior operations management person assigned to evaluate crew performance. The individual evaluators and the crew evaluator utilize a performance checklist which clearly defines the expected actions of the individual members of the crew, as well as expected actions which can be accomplished by any member of the crew. The checklist details who is expected to accomplish each task, i.e., Center Desk Nuclear Station Operator (CD), Utility Nuclear Station Operator (UNSO), Unit Nuclear Station Operator (NSO), Shift Control Room Engineer (SCRE), Shift Engineer (SE), or Crew. The checklist also defines each task to be performed during the dynamic scenario and provides an area to indicate satisfactory or unsatisfactory individual or crew performance, as appropriate, for each task listed.

In conjunction with the performance checklists, which are an integral part of the scenario documentation, the station's standards contained in Dresden Station Procedures, Policies, and Training Department Instructions concerning communications and procedural usage are applied consistently to the specific actions required by the dynamic scenario. There would be no value added by detailing these generic communication, and procedure usage requirements in each line item on the performance checklists. If significant weaknesses are identified in an individual's performance, i.e., unsatisfactory performance for any one action or several noted weaknesses during satisfactory performance of several actions, then an evaluator completes an individual competency form from Exam Standard (ES) 303 for the individual as directed by guidelines for completing the simulator dynamic portion of the examination. The completed ES 303 form is then filed with the rest of the scenario documentation.

To enhance the evaluation process for future requalification examinations, the individual competencies from ES 303 have been integrated into the performance checklist documentation and will be utilized in conjunction with the performance checklist to evaluate an individual's performance. This enhancement will improve the consistency of the evaluators while monitoring an individual's performance. Additionally, the ES 303 form will continue to be used when significant weaknesses in an individual's performance are identified.

Dresden Station considers the process of individual examination and evaluation used during the annual requalification exam was in full compliance with 10 CFR 55.59(a)(2), and that the enhancements identified above will improve the process during future examinations under a "Systems Approach to Training".

ATTACHMENT
RESPONSE TO COVER LETTER CONCERNS
NRC INSPECTION REPORT
50-237/94004; 50-249/94004
(Continued)

SUPPLEMENTAL RESPONSE TO VIOLATION 50-237/93024-01:

Violation: (50-237/93024-01)

10 CFR Part 55.21, states that a licensee shall have a medical examination by a physician every 2 years.

Contrary to the above, during the period from January 25 to August 30, 1993, ten operators, licensed pursuant to 10 CFR Part 55, did not receive the required medical examinations. During this period of time, several of the subject operators performed licensed duties at the Dresden Nuclear Station.

Supplemental Response/Corrective Action to Prevent Recurrence:

Due to the subsequent release of NRC Information Notice 94-14, Failure to Implement Requirements for Biennial Medical Examinations and Notification to the NRC of Changes in Licensed Operator Medical Conditions, the following change has been made:

Dresden Station Training Department Instruction (TDI) 502, which provides the guidance for the administration of NRC license applications, medical examinations, etc., has been modified to clearly state that the requirement for license holders to complete a medical examination is every two years based on the date of their last medical examination. License holders failing to comply with this requirement will be removed from licensed duties until medically qualified.