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October 18, 1995

JSPLTR 95-0012

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555


Subject: Dresden Nuclear Generating Station, Units 2 and  
3; Docket Nos. 50-237 and 50-249. Response to  
Concerns in NRC Inspection Report 50-237/OL-95-02 Regarding  
Failure Rate of Licensed Operator Initial Examinations.

Reference: G. E. Grant letter to T. Joyce, dated September 19, 1995, transmitting  
NRC Inspection Report No. 237/OL-95-02.

The purpose of this letter is to describe the causes of the high failure rate of Initial Licensed Operator candidates as requested in the reference letter. We have recently completed an investigation into the specific causes of these failures, as well as a comprehensive evaluation of our Initial Licensed Operator training program. Based upon these reviews, we have developed corrective actions and program improvements designed to ensure better performance on future examinations. The attachment to this letter describes the results of these reviews, and the actions being taken to address identified weaknesses.

If there are any questions concerning this letter, please refer them to Peter Holland, Dresden Station Regulatory Assurance Supervisor, at (815) 942-2920, extension 2714.

Very truly yours,

  
J. Stephen Perry  
Vice President  
BWR Operations

JSP/kls

cc: H. J. Miller, Regional Administrator, RIII  
G. E. Grant, Director Division of Reactor Safety, RIII  
J. F. Stang, Project Manager, NRR (Unit 2/3)  
C. L. Vanderniet, Senior Resident Inspector, Dresden  
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## ATTACHMENT

ComEd performed two reviews which identified causes of the Initial License trainee failures. First, an investigation of the excessive failure rate on the 1995 NRC initial license examination was performed by Dresden personnel. Second, an evaluation team, knowledgeable in the training accreditation process, was assembled with representatives from Dresden, Quad Cities, LaSalle, Browns Ferry, and the ComEd Corporate Office. The team utilized the Institute of Nuclear Power Operations' criteria for evaluation of licensed operator training. The results of these reviews identified the following causes of the Dresden candidates' poor performance on the examination:

- The Training Department demonstrated low standards in program implementation by failing to adequately follow Training Department Instructions, which resulted in:
  - \* Poor evaluation of trainee performance, including an insufficient number of examinations during the training period.
  - \* Inadequate feedback from the training department to line management on the progress of individual candidates.
  - \* Inadequate remediation given to trainees. Examinations identified performance problems and the only remediation which occurred was an interview with the cognizant instructor, rather than involvement by senior Operations and Training Management. This was particularly a problem with respect to trainee weaknesses in mastering Dresden Emergency Operating Procedures.
- Lack of line management involvement in observing and critically evaluating training sessions led to performance weaknesses not being identified during the Simulator and On the Job Training (OJT) phases of training.
- Failure to adequately train and evaluate the candidates on Dresden Administrative Procedures.

- The NRC pre-exam review conducted by the Training Department did not identify a number of questions with technical inaccuracies. Weaknesses in this review were due to a lack of management oversight of the review process resulting in insufficient resources being assigned to the review. Corrections to the technically inadequate questions have been forwarded to the Chief Examiner. The marginal questions on the exam resulted in lower test scores, but the differences in scores attributable to these questions were not enough to alone have caused any exam failures.

Based upon these findings, Senior Station Management has made the improvement of Initial License Training Program a high priority. The following corrective actions are being implemented to address the causes of the failures:

- To provide more focus on establishing and maintaining a high-quality training organization, the position of Training Manager has been raised to a higher grade and is now a direct report to the Site Vice President. The Training Manager position has been filled with a former Operations Manager to ensure that training provides the knowledge and skills required for successful on the job performance.
- To ensure that Training Department personnel adhere to procedures and department instructions with respect to program implementation, trainee evaluation, and remediation, Training Department Performance Standards have been developed. Department personnel are being trained on these standards. Evaluation of adherence to these standards has been incorporated into the feedback requested of line managers during their observations of training sessions. These standards and evaluations will be used as the basis for individual performance reviews of Training Department personnel and decisions as to whether coaching or other personnel action is warranted. Line management evaluations of the implementation of Training Department Standards will begin November 1, 1995.

- To ensure better evaluation of trainees, improved remediation, and removal of weak performers, the Training Department Instruction for Licensed Operator Initial Training (TDI-508, rev. 7) has been revised to provide for the following:

- \* Clear definition of expectations and responsibilities of Line Management for observation and evaluation of simulator and OJT phases of the Initial License Program. The Operations Manager will develop specific goals for the observation of license candidates and incorporate these into the 1996 Operations' management performance evaluations. The goals will delineate the number of observations required by the Operations Manager, Shift Operations Supervisor, and Shift Managers. The goals are to be developed by December 15, 1995.
- \* Notification of responsible line management of trainees' grades on written examinations. Line management also will be notified when a trainee is identified as 'weak' through observed performance during simulator or in-plant evaluations.
- \* Notification of line management when trainees are in jeopardy of failing a phase of the training program.
- \* Guidelines for specific remediation steps to be taken in response to trainee failure or weakness during any phase of the training program, including remediation re-examination as determined by the Performance Evaluation Committee per TDI-105. These guidelines encompass Dresden Emergency Operating Procedure training and directions for line management participation in remediation.
- \* Directions as to when examinations are given in the program. The number of examinations has been increased during the simulator and OJT phases from 3 written examinations to 11 examinations .

- To improve line management involvement in the Initial License Training program, several steps are being taken. Initial License Training class schedules are being published on a monthly basis so that managers can more easily schedule observations of important training sessions. Tracking of management observations of Operator Training has been refined so that any instances in which particular instructors, class types, or candidates have not been subject to line management observation can be identified. The Performance Monitoring Group Leader has been assigned to monitor this information to ensure that candidates and program elements receive appropriate line management observation and evaluation.
- Effective training on Dresden Administrative Procedures has been a long standing problem. To improve performance in this area, Dresden's Training Department is scheduling benchmarking trips to other utilities to determine more effective ways of selecting, training, and evaluating administrative topics. This benchmarking will cover of administrative procedure training at stations recommended by INPO and will be completed by December 1, 1995. Dresden will use information collected on these benchmarking trips to improve training on Administrative Procedures.
- Improved review of proposed NRC examination questions will be accomplished through the implementation and reinforcement of higher standards in the Training Department and greater management involvement in ensuring a high quality review. Management will also ensure that appropriate resources are devoted to the review during future training cycles.

These Initial License Training program corrective actions will be implemented on a schedule which ensures that required corrections are completed for each program segment prior to the conduct of that segment during the next class.