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Docket Nos. 50-10, 50-237, 50-249, 50-254, 50-265, 50-295,
50-304, 50-373, and 50-374

Commonwealth Edison Company
ATTN: Mr. R. L. Bolger,
Assistant Vice President
P. O. Box 767
Chicago, Illinois 60690

Gentlemen:

We have reviewed the proposed revised Dresden, Quad-Cities, Zion and LaSalle County Stations "Requalification Program for Licensed Operators, Senior Operators and Senior Operators (Limited)", submitted on June 7, 1976. Based on our review, we have determined that the additional information indicated in Attachment A is necessary for us to complete our review. The enclosure also indicates our position relative to each outstanding issue.

Until our review is completed, the approved program as submitted April 5, 1974 is still in effect at the Dresden, Quad-Cities and Zion Stations and shall be used for requalification training.

Sincerely,

ORIGINAL SIGNED BY
P. F. COLLINS

Paul F. Collins, Chief
Operator Licensing Branch
Division of Project Management

Enclosure:
Attachment A

cc: See next page

DOR:ORB1 PM:OLB
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OFFICE >	PM:OLB <i>RJC</i>	PM:OLB <i>RJB</i>	PM:LWR-4	DOR:ORB2	DOR:ORB2 <i>WCE</i>	DOR:ORB2
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DATE >	10/1/76	10/1/76	10/1/76	10/4/76	10/4/76	10/5/76

cc: Mr. John W. Rowe
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Attachment A
Questions regarding the Operator Requalification
Program Revisions for
COMMONWEALTH EDISON COMPANY
DRESDEN, QUAD-CITIES, ZION AND LASALLE STATIONS

1. Section 2, Item A allows for three days of training per year at a simulator for each licensed individual. Our position is that these three training days shall be consecutive.
2. Section III, Item B allows for the reduction of the three previously required plant control manipulations on Dresden Unit No. 1. Our position is that the revised program shall include the original requirement of three Unit 1 plant control manipulations.
3. Section IV, Item A.1 allows for administering the annual written examination in a maximum of four individual examinations. Our position is that dividing the annual written examination into over two parts is not acceptable. This examination may be administered as two examinations to be given within a three month period. If the examination is administered in two parts, the annual grade will be the average of the two quarterly grades.
4. Section IV, Item A.3 requires individuals to attend lectures on subjects when his grade is less than 80% on that subject on the annual examination. Our position is that periodic quizzes shall be administered at the end of a lecture or series of lectures on the subjects listed in Section I, A-G. If an individual receives a grade of less than 80% on these quizzes then additional training shall be administered.

5. Section IV, Item A.4 includes the requirements for relieving a individual from licensed duties if his grade is less than 70% on the annual written examination. We believe that this item should be amended to provide for the administration of an oral examination. This oral examination shall be administered within 14 days of the determination that the operator or senior operator has received a grade of less than 70%. If an individual demonstrates that he can operate the plant safely, he may be permitted to continue performing licensed duties while participating in an accelerated requalification program. An individual who fails to demonstrate that he can operate the plant safely shall be relieved of all duties requiring the use of his license and shall participate in an accelerated requalification program. He may return to his licensed duties following completion of requalification training which shall also include a grade of not less than 70% on the written re-examination.
6. Section IV, Item B allows for exemption of certain individuals from the annual examination. Our position is that a maximum of two licensed individuals per station will be exempt from taking any annual written examination, provided these individuals are directly involved in the preparation and grading of the examination. The program shall specify who, by title, may be exempt.
7. Certain sections of the revised program contain the words will and shall. Our position is that the word "shall" denotes a requirement; the word "should" denotes a recommendation; and the word "may" denotes

permission, neither a requirement nor a recommendation. Please review the proposed change so that wording is consistent with the above.

8. Section V, Item B provides for the review of applicable procedures and changes to procedures and facility design. The revised program indicates that this review will be accomplished in a three day period every year. It is our position that these procedures also shall be reviewed on a continuing basis and that design and procedure changes shall be promptly reviewed by these licensed individuals as these changes are implemented.
9. Section IV, Item C provides for training of licensed individuals who are not normally at the stations. This item should be deleted from the subject program since a separate training program for these personnel was approved on September 15, 1976.
10. Attachment A, Item 8 allows credit for a plant control manipulation when fuel is moved over the core. This item should be revised so that credit is given only when fuel is moved within the core.