

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-010/77-24; 50-237/77-22; 50-249/77-22

Docket No. 50-010; 50-237; 50-249 License No. DPR-02; 19; 25

Licensee: Commonwealth Edison Company
P.O. Box 767
Chicago, IL 60690

Facility Name: Dresden Units 1, 2 and 3

Inspection at: Dresden Site, Morris, IL

Inspection Conducted: August 24-26, 30 and 31, 1977

Inspector: *F. A. Maura*
F. A. Maura

9/14/77

Approved by: *W. S. Little*
W. S. Little, Chief
Nuclear Support Section

9/14/77

Inspection Summary

Inspection on August 24-26, 30 and 31, 1977 (Report No. 50-010/77-24;
50-237/77-22; 50-249/77-22)

Areas Inspected: Routine, unannounced inspection of the training program for unlicensed individuals, and the requalification training program for licensed individuals. The inspection involved 37 inspector-hours onsite by one NRC inspector.

Results: Of the two areas covered no items of noncompliance or deviations were found in one area. One apparent item of noncompliance was found in one area (deficiency - failure to document attendance of some individuals to mandatory retraining, Paragraph 2).

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DETAILS

1. Persons Contacted

- *A. Roberts, Assistant Superintendent
- *B. Zank, Assistant Training Supervisor
- N. Howlet, Training Instructor
- T. Blackman, Training Instructor

The inspector also talked with and interviewed several other licensee employees, including instrument mechanics, rad-chem technicians, electrical helpers, equipment attendants, and subcontractor personnel.

*denotes those present at exit interview.

2. Requalification Training

The inspector verified that for the 1976-77 school year a requalification program which met the requirements of the "Requalification Program for Licensed Operators, Senior Operators, and Senior Operators (Limited)", approved by the NRC on May 11, 1977, was carried out.

Due to scheduling problems experienced in prior years, the requalification program for the school year to start in September 1977 has been modified. Under the proposed program all subjects are covered within a 4 day week and are repeated each week to ensure all personnel are covered prior to the expiration date of their license. Each semester the material covered under a specific subject is varied. The problem with this new method is the possibility that the lectures may not cover each subject to the depth required by individuals for whom the lectures are mandatory (those who receive a grade ≤ 80 on a particular subject on their last annual examination), and that the quiz given at the end of the week may only have one or two questions on each subject covered. While the proposed program appears to be satisfactory for most licensed individuals it does not satisfy the requirements for those individuals for whom attendance to specific lectures and taking of quizzes is mandatory. This item was discussed at the exit interview.

The inspector reviewed the records of several licensed individuals and found them to meet the requirements of the Requalification Program approved by the NRC on May 11, 1977, and the applicable

Administrative and Training procedures with the exception that the records failed to indicate that Employee "A" attended a mandatory lecture on Engineered Safety Features prior to taking the quiz on February 10, 1977 and that Employee "B" attended a mandatory lecture on Instrumentation and Controls prior to taking the quiz in December 28, 1976. This is considered to be a deficiency from the requirements of Technical Specifications 6.5.B.11. This item was discussed at the exit interview.

The inspector noted that several licensed individuals are quite behind in their reading of the "Weekly Required Reading" material. Some of the individuals, all holders of SRO licenses, are over 26 weeks behind with the worse being approximately 46 weeks behind in their reading. (The amount of reading material accumulated during that period is ~2 ft high). All are due for license renewal later this year. The inspector discussed this at the exit interview pointing out that this problem had been discussed with site management on June 2, 1976, with no apparent success.

The inspector noted that the Dresden Personnel Procedure (DPP-5) which covers the requalification program fails to address the program for licensed off-site personnel. This item was discussed at the exit interview.

3. Training Program - Nonlicensed Personnel

The inspector verified that a formal training and retraining program exists for new employees, temporary employees, nonlicensed operations personnel, technicians and craft personnel. The program as defined by the Dresden Personnel Procedures (DPP series, revised May 1977) cover administrative controls and procedures, radiological health and safety, industrial safety, security procedures, emergency plan, quality assurance, fire fighting, and on the job training.

Responsibilities to assure that the training program requirements are met and for the conduct of periodic evaluations of the program are described in Administrative Procedures DAP 8-1 and 8-2.

The inspector verified by direct questioning and record review that the required training was provided to two electrical helpers, two relatively new rad-chem technicians, one instrument mechanic ("B" man) two temporary employees, three new employees (less than one year), and two existing employees (over two years).

During the interview the following suggestions were made by the employees. The suggestions were discussed with site management at the exit interview.

- a. Management personnel who are sent for training to vendor's school should upon their return train the personnel who actually maintain the equipment.
- b. Whenever possible, "B" instrument mechanics who have no specific assignment at the time be sent with the "A" -IM's who are doing surveillance testing, calibrations, etc., for on-the-job training.
- c. Refresher course in the use of Scott-Air Packs should include the actual use of the equipment in addition to the video tape. (The inspector noted during the exit interview that this should be mandatory of at least all personnel assigned to fire fighting.)
- d. Equipment, valves, lines, etc., should be marked for easy identification by new personnel. Such marking would be very beneficial in cases of trouble or emergency.

No items of noncompliance or deviations were identified.

4. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on August 31, 1977. The inspector summarized the scope and findings of the inspection. The licensee made the following remarks in response to certain of the items discussed by the inspector:

Acknowledged the statement by the inspector regarding the item of noncompliance (Paragraph 2).

Acknowledged that there appeared to be problems with the requalification program as planned for the coming school year. They will look into it to see what modifications have to be made so that it satisfies the requirements for individuals for whom the program is mandatory (Paragraph 2).

Agreed to include the requalification program for licensed off-site personnel in procedure DPP-5 (Paragraph 2).

Agreed to consider the recommendations made to the inspector by interviewed personnel and noted that marking of plant equipment has been done on all new systems installed during the last three years and is planned for Unit 2 during the coming refueling outage (Paragraph 3).