

OCT 24 1990

Docket Nos. 50-295; 50-304
License Nos. DRP-39; DRP-48
EA 89-255

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Gentlemen:

Thank you for your August 22, 1990 letter which provided additional information requested by our July 6, 1990 letter, regarding the licensed operator requalification program at the Zion Nuclear Station. Our July 6, 1990 letter requested you address certain concerns we had with respect to the remedial training portions of the licensed operator requalification program.

Your response to our questions provides us with an indication of adequate programmatic controls. Inspection of these areas at a later date may be used to confirm the adequacy of their implementation.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

H. J. Miller, Director
Division of Reactor Safety

See Attached Distribution

RIII
yow
Wright/db
10/23/90

RIII
Pederson
Pederson
10/23/90

RIII
Miller
Miller
10/24/90

9011010051 901024
PDR ADOCK 05000295
P PNU

OCT 24 1990

Commonwealth Edison Company

- 2 -

Distribution

cc w/ltr dtd 8/22/90:

M. Wallace, Vice President,
PWR Operations

T. Kovach, Nuclear
Licensing Manager

T. Joyce, Station Manager

R. Chrzanowski, Regulatory Assurance
Supervisor

DCD/DCB (RIDS)

OC/LFDCB

Resident Inspectors, Byron,
Braidwood, Zion

Richard Hubbard

J. W. McCaffrey, Chief, Public
Utilities Division

Mayor, City of Zion

Chandu Patel, LPM, NRR

Robert Newmann, Office of Public
Counsel, State of Illinois Center

J. Lieberman, OE

W. Troskoski, OE



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 22, 1990

Director
Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Zion Station Units 1 and 2
Supplemental Information for
Notice of Violation (EA 89-255)
Inspection Report 50-295/89040 and 50-304/89036
NRC Docket Nos. 50-295 and 50-304

Reference: (a) April 12, 1990, letter from T.J. Kovach to
Director, Office of Enforcement
(b) July 6, 1990, letter from E. Baker to Cordell Reed

Gentlemen:

Commonwealth Edison provided a response to the Zion Station Notice of Violation, in reference (a), regarding the two violations pertaining to the senior reactor operator (limited) with an inactive license performing licensed duties without standing the required on shift refresher watch and the failure to revise the requalification program at Zion to include requirements that operators attend preplanned lectures and to establish controls that ensure missed sessions are made up. A civil penalty was proposed and Commonwealth Edison submitted payment. Reference (b) requested a response to questions regarding the revised Zion Station requalification program. This letter addresses those questions.

The normal Zion Station Operating schedule is structured such that one out of every five weeks is designated as a training week for each of the five shifts. This training week contains 32 hours of available time for training instruction and this cycle occurs 10 times to yield the 320 hours that are available for training. Therefore, the licensed operator training material is repeated five times, once for each shift. Of those available hours, the Zion Station licensed operator requalification program consists of 8 of the ten cycles. Therefore, to answer the first question regarding the use of self study as the only means of remediation, page 1 of the attached requalification flow chart shows that if another lecture from the same cycle is available, then the first and preferred remediation means is to attend another lecture on the same material. If another lecture is not available, either due to shift assignment conflicts or if the missed lecture was the last of that cycle and will not be offered again, then a second acceptable means of remediation is self-study of the material by the end of the next quarter. In either case, a weekly quiz must be successfully completed within the bounds of the requalification program that will be described later in this letter.

The second question pertained to the controls that ensure the specific 180 hours of required training is received on subjects identified through the SAT process. Attendance is required, or makeup is permitted as described above, for each lecture that comprises the 180 hours of required lectures identified through the SAT process. The remainder of the available training consists of out-of-service card training, general employee training, fire brigade training, the administration of the requalification examination consisting of JPM's, simulator, and the written test, and some simulator training. This training is in addition to the required 180 hours of specific lecture material to satisfy the licensed operator requalification program. In summary, a prescribed 180 hours of lecture material is defined to satisfy the requirements of the requalification program. The additional 140 hours of training consists of additional training time for the administration of the examination and non-requalification program training, totaling 320 hours of training per year.

~~9008310029~~
AUG 28 1990

August 22, 1990

The last question pertained to the policy for remediation of individuals who fail required quizzes. The process is most easily explained if it is divided into four categories. The first category applies to individuals who pass the quiz with a score of greater than or equal to 80%. In this case, no remediation is required and the individual is permitted to take the requalification examination.

The second category applies to individuals that fail the test with a score of less than 70%. In this case, the Assistant Superintendent of Operating and the individual are notified of the score and the specific weaknesses are identified. A remediation quiz is scheduled and must be passed prior to taking the requalification examination.

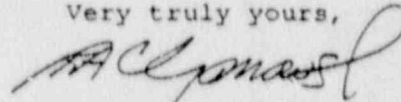
The third category applies to individuals that score less than 80% yet greater than or equal to 70% on a specific weekly quiz. In this case, the Assistant Superintendent of Operating and the individual are notified of the score and the specific weaknesses are identified. A remediation quiz is not required at this point and the individual is permitted to take the requalification examination.

The fourth and last category applies to individuals that have a rolling 6 quiz average of less than or equal to 80%. In this case, the individual is removed from shift and the Assistant Superintendent of Operating and the individual are notified of the average and the specific weaknesses. A comprehensive remediation examination must be taken and a score of greater than or equal to 80% is required prior to returning to shift and being permitted to take the requalification examination.

The attached flow chart depicts the appropriate actions that are taken to satisfy the requirements of the licensed operator weekly requalification program.

If any further questions exist, please direct them to this office

Very truly yours,



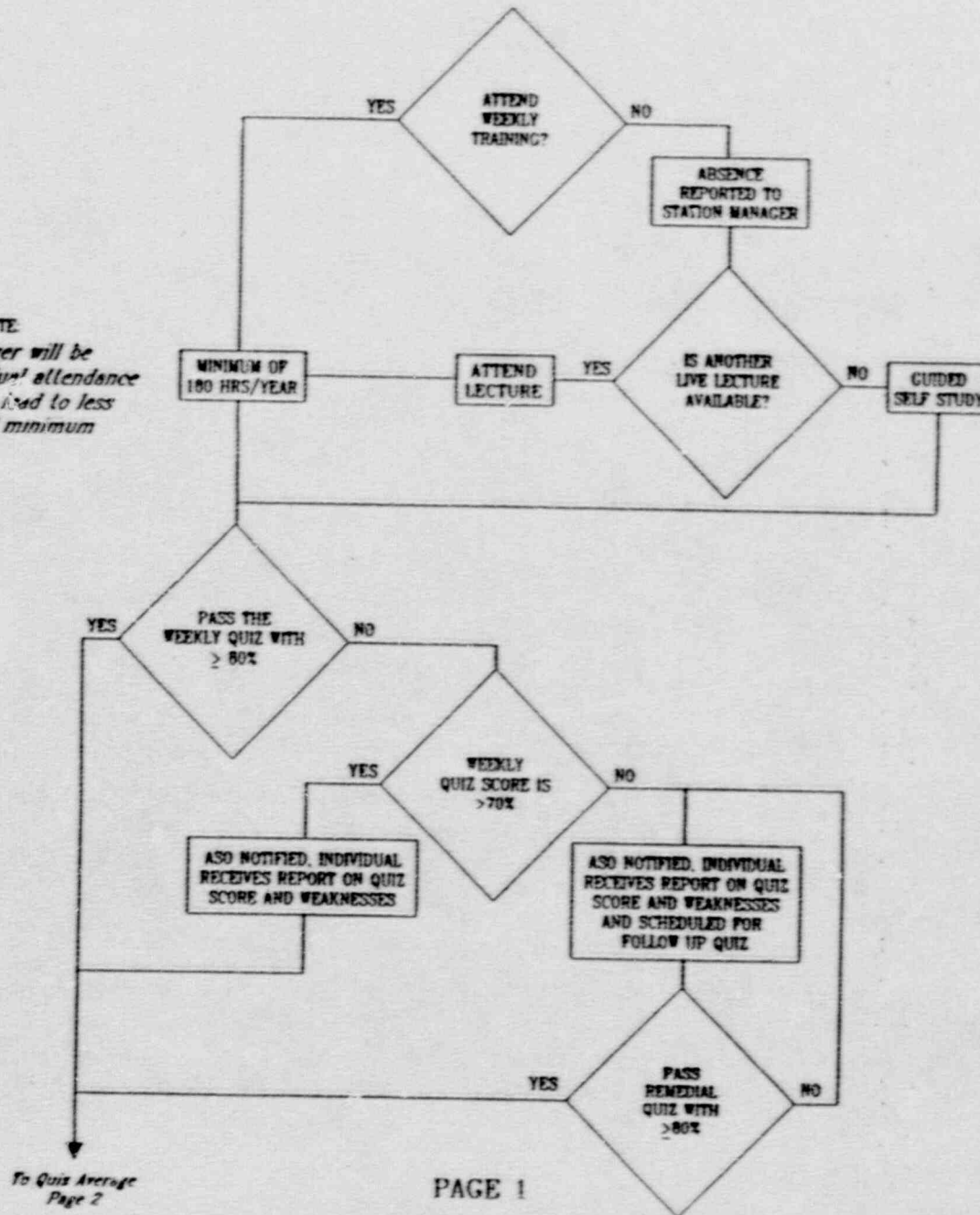
R. A. Chrzanowski
Nuclear Licensing Administrator

Attachment

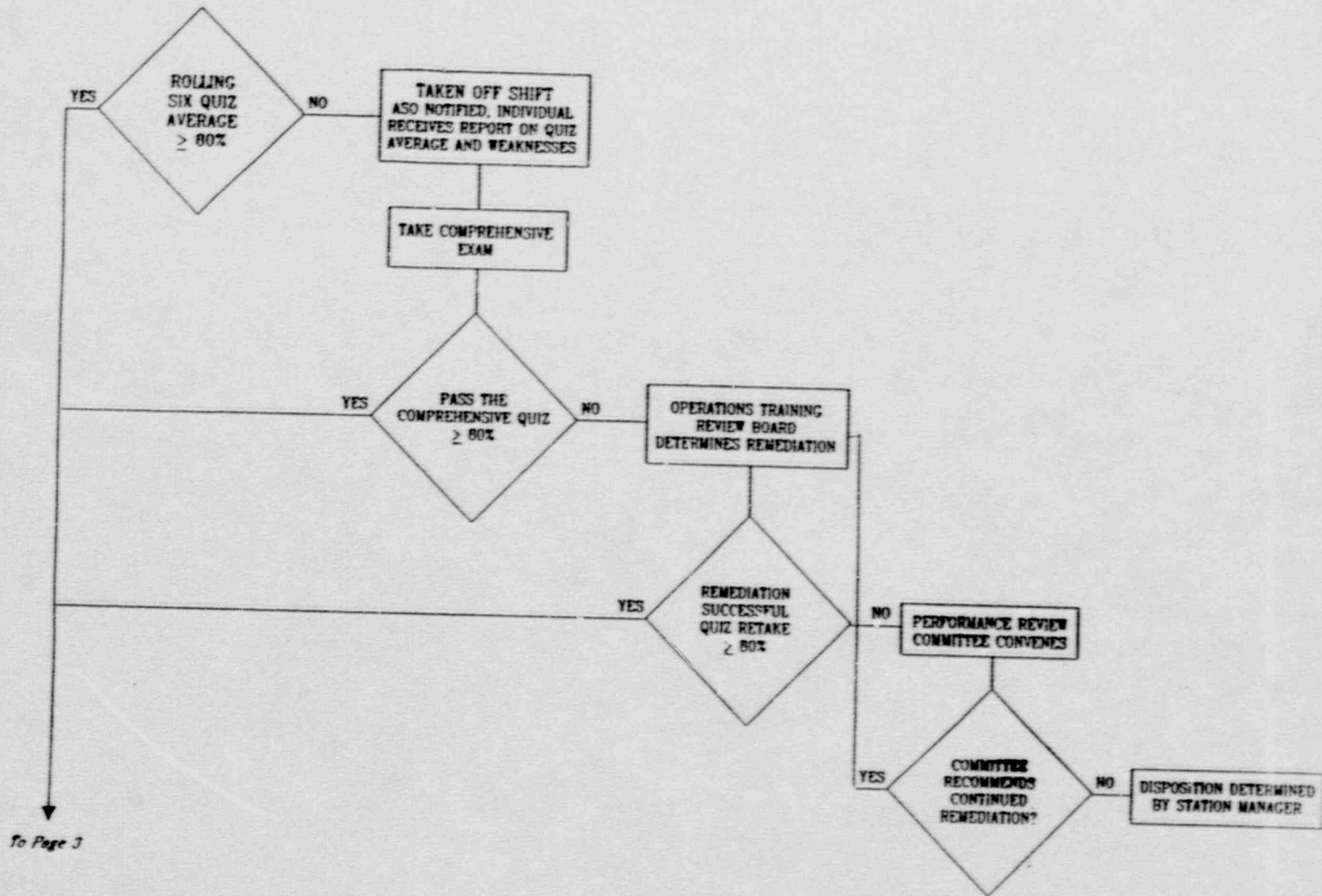
cc: C. Patel - NRR
Region III Office
Zion Resident Inspector

LICENSED OPERATOR RETRAINING WEEKLY PROGRAM

NOTE:
The Station Manager will be notified of individual attendance trends that could lead to less than the required minimum participation



LICENSED OPERATOR RETRAINING QUIZ AVERAGE



To Page 3

LICENSED OPERATOR RETRAINING REQUALIFICATION EXAM

