



Commonwealth Edison

Dresden Nuclear Power Station

R.R. #1

Morris, Illinois 60450

Telephone 815/942-2920

January 11, 1983

DJS LTR: #83/16

Mr. Robert L. Gregor, Chief
Facilities Radiation Protection Section
Directorate of Inspection and Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

SUBJECT: Dresden Nuclear Power Station Unit 1, 2, and 3
Radiochemistry Staff Qualifications in accordance
with ANSI Standard N18.1-1971

Dear Mr. Keppler:

During a recent inspection, Mr. R. Paul of your staff requested that we document in a letter to you the basis for the qualifications of our Radiochemistry staff in accordance with ANSI Standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel".

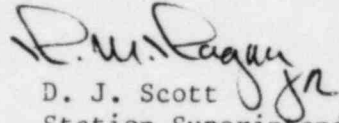
Following the guidance in Commonwealth Edison Nuclear Stations Division Directive No. 024, dated March 7, 1982, the person with the CECO payroll title of "Lead Chemist" at Dresden Station is not required to meet the requirements of Section 4.3.2 "Supervisors Not Requiring NRC Licenses". The supervisors mentioned in that section are further described in Section 3.2.2 of the standard as persons principally responsible for directing the actions of operators, technicians or repairmen. The Laboratory Foreman within the Chemistry group meets those requirements at this station. Although the standard mentions that first line and intermediate supervisors usually meet this requirement, it does not require all supervisors to do so.

Section 4.4 Professional - Technical includes additional requirements for individuals within the Professional - Technical groups. Subsection 4.4.3 "Radiochemistry" requires a responsible person within the Chemistry group to have a minimum of two years of related technical training. Mr. George Myrick, the Radiation/Chemistry Supervisor at Dresden Station, fulfills this requirement and supervises the entire Chemistry group. However, other members of the Chemistry group also meet the requirement of two years of related technical training. It is our opinion therefore that the "Lead Chemist" need not

January 11, 1983

specifically meet the two year experience requirement.

Very truly yours,



D. J. Scott
Station Superintendent
Dresden Nuclear Power Station

DJS:DLF:mb
Attachment

cc: T. Tongue
T. Rausch
D. Galle
File/Numerical
File/NRC

Ⓢ ORIG: FILE/DIV MGR NUC STA

~~ORIG: SCOTT~~

M

82-1948

NUCLEAR STATIONS DIVISION DIRECTIVE

No. 024

Effective Date: March 7, 1982

Revision Date: June 15, 1982

Messrs: K. Graesser
D. Scott
R. Holyoak
J. Gudac
R. Querio
N. Kalivianakis

REC'D JUN 22 1982

Subject: (Personnel Qualifications)

The NRC within the last year has placed an increased emphasis on auditing the qualifications of nuclear division personnel for compliance to ANSI/N 18.1-1971 or other personnel qualifications specified in the station FSAR or Technical Specifications. In order to provide a consistent policy for correcting our deficiencies in this area, each station must provide a brief written summary of the qualifications for those personnel filling positions which require this information.

This can be accomplished by having the individual requiring qualification to write his own summary with review and written approval by his supervisor. This record can then be maintained in the station's personnel file. The qualifications of personnel being considered for future vacancies shall be reviewed prior to filling such vacancy to ensure that a qualified person is selected. If the person selected for a vacancy does not meet the qualification requirements, the Station Superintendent shall document the method to be used to fulfill the qualification requirements until the person selected becomes qualified. Example, the Technical Staff Supervisor may fulfill the qualifications of the Rad-Protection Supervisor if this person does not meet the qualification requirements; or if the vacancy must be filled on an emergency basis, a less qualified person can be used as indicated in ANSI/N 18.1-1971 section 3.1 "General".

The following listed station positions require qualification documentation:

Plant Manager (Superintendent)

Operations Manager (Operations Ass't. Supt.)

Maintenance Manager (Maintenance Ass't. Supt.)

Technical Manager (Admn. and Support Services Ass't. Supt.
or Tech. Staff Supervisor)

Instrumentation and Control Engineer (Master Instr.
Mechanic)

Nuclear Engineer (Group Leader)

Radiation Protection Manager (RC Supervisor or Qualified Lead H.P.)

Radiochemistry (site person)

Supervisors requiring NRC Licenses (Includes Training and Fuel Handlers)

Supervisors not requiring NRC License (Maintenance Foremen, Rad Chem Foremen, Radwaste Foremen, Q.C. Supervisors and Operating Foremen)

Technicians (RCT's)

Repairmen (CST's, Sr. Nuclear Mech., Sr. Elect. Mech. "A" Fuel Handler)

Operators (NSO's, EO's)

Security Administrator (See ANS 18.17-1973 section 4.5.2)

The following personnel do not need qualification documentation at this time:

Personnel Administrator

Training personnel for non-licensed training

Administrative Supervisors and clerks

Accountants

Construction Supervisors on-site

Tour Director

Storeroom Personnel

Tech Staff Engineers, Chemists, Health Physicists*

Engineering Assistants, Nuclear Technicians*

Quality Control Inspectors**

Stationmen and Janitor Foremen

- * These personnel may need qualification documentation if assigned tests requiring such information. (See Appendix 1)
- ** These personnel may need qualification documentation if assigned to perform inspection activities requiring such information (ANSI/ASME N45.2.6-1978).

Dennis Galle

D. P. Galle

/gm

cc: B. Lee, Jr.
C. Reed
W. J. Shewski
E. E. Fitzpatrick
L. C. Bird
G. P. Wagner
W. P. Worden
L. G. Soth