



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 18, 1991

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road-R111
Glen Ellyn, IL 60137

Subject: Zion Station Units 1 and 2
Response to Inspection Report
Nos. 50-295/90025 and 50-304/90027
NRC Docket Nos. 50-295 and 50-304

Reference: (a) November 29, 1990 letter from
T.O. Martin to Cordell Reed

(b) August 22, 1990 letter from
R.A. Chrzanowski to U.S. NRC,
Office of Enforcement

Dear Mr. Davis:

The letter of reference (a) provided the results of a special safety inspection of the activities at Zion Station Units 1 and 2 on October 22 through November 19, 1990.

The inspection was conducted to follow-up on allegations regarding monitoring of the conduct of licensed operator training and the assurance of required attendance at training classes. NRC expressed concern with attendance at licensed operator requalification training, and as such, requested a written response regarding Zion's formal measures for enforcing and ensuring attendance at required training sessions. The inspection report did not provide a due date for this response. In a telephone call on January 4, 1991, with Mr. G. Wright, Commonwealth Edison agreed to provide this response no later than January 18, 1991. The Commonwealth Edison response to this request follows.

Zion station has re-evaluated its threshold for allowing absence from licensed operator training classes. We agree that scheduled training should be attended and absence limited. To that end, the Station Manager is preparing a memo to all license holders and their department heads which will set forth Zion Station's expectations regarding attendance. This memo will describe that attendance is mandatory, except under circumstances such as illness or plant emergency. The memo will be issued in February 1991, and will be discussed with license holders during scheduled training periods.

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Training material is offered each cycle in five one week periods. License holders may attend another classroom session in the same cycle if they cannot attend as originally scheduled. The referenced letter describes actions to be taken in the event the classroom training is missed. To improve management oversight and control of requalification training attendance, the following policy will be implemented by the end of February, 1991. If a license holder cannot attend any of the five one week training periods in a given cycle, that absence must be pre-approved in writing by either the Production Superintendent, Technical Superintendent, Assistant Superintendent for Operations, Services Director, or Station Manager. Copies of these authorizations will be maintained by the Training Department.

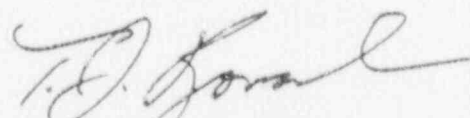
Reviews conducted by Zion Station identified that attendance problems were in part attributable to the routine work load of staff inactive license holders. Zion has reviewed the need to maintain the current number of staff licenses and has determined that a reduction in the number of staff inactive licenses is appropriate. Zion currently plans to reduce by 12 the number of staff inactive licenses. We believe that reducing the number of these types of license holders will aid in minimizing attendance problems.

We will continue to monitor attendance at training to provide management a tool by which they can ensure attendance requirements are being met.

Commonwealth Edison is confident that these steps will provide the measures necessary to ensure attendance at required training. We invite the NRC to visit Zion Station at their convenience to review our records on this matter.

If you have any questions regarding this response, please direct them to this office.

Respectfully,



T.J. Kovach
Nuclear Licensing Manager

cc: NRC Document Control Desk
C. Patel-NRR
J.D. Smith-Resident Inspector-Zion