Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 27, 1992

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Zion Nuclear Power Station Unit 1 and 2
               Response to Inspection Report 50-295/OL-92-02
               NRC Docket Numbers 50-295 and 50-304

Reference: H. J. Miller letter to Cordell Reed dated
               August 31, 1992 transmitting Inspection Report
               No. 50-295/OL-92-02

Enclosed is the Commonwealth Edison Company (CECo) response to the
identified concern which was transmitted with the referenced letter and Inspection
Report. The concern was in regards to Emergency Operating Procedure (EOP) usage
during dynamic simulator examinations. The response also describes the results of
Commonwealth Edison's root cause analysis for the high failure rate.

Based upon conversations with NRC Region III Staff, the response due date was
extended to seven (7) days after a planned management meeting. which was held on
October 20, 1992.

Several meetings were held with various members of both the Zion and NRC staffs
prior to the October 20, 1992 meeting, with the expressed interest of data exchange and
additional discussions regarding the concern of procedure usage. It is CECo's
understanding that the previous meetings have addressed the issue of procedure usage
and concluded that, while the examination may have illustrated examples of errors in
procedure usage, these errors were not the result of a "cookbook" or "blindly-following"
approach to the implementation of Emergency Operating Procedures (EOPs).
Furthermore, these discussions concluded that many of the procedure usage concerns
may be related to striking a balance between the competitive goals of performing an
individual evaluation of a candidate and performing an assessment of the demonstration
of teamwork attributes. Therefore, it is CECo's understanding that the "cookbook" issue
is better defined as a crew communications/dynamics issue.

CECo's root cause analysis for the high failure rate identified that the failure of
three (3) of the Initial License Training (ILT) candidates was due to the placement of a
Reactor Operator (RO) in the Senior Reactor Operator (SRO) position during the
Simulator Operational examination. Since Zion Station had not previously emphasized
crew dynamics in the preparation of the ILT candidates, the placement of the RO in the
SRO position jeopardized the performance of the entire crew during the operational
examination. Greater emphasis on crew dynamics could have mitigated the effects of the
RO performing the duties of the SRO in this case. Therefore, Zion Station will evaluate
what additional emphasis on crew dynamics should be incorporated into the ILT
Program. Additional dialogue between CECo and NRC may be necessary to assure that
the appropriate balance between teamwork and individual performance is obtained.

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The root cause analysis also identified contributing factors to the examination failure rate. The following recommendations, associated with these factors, are being incorporated into Zion's Initial License Training and Examination program:

- Restructure the ILT Program to lessen the time between Certification and the NRC Examination for the next ILT class. This was done by splitting the Simulator training to allow the on-the-job (OJT) portion of the training to be completed prior to the Certification Examination.

- Develop and implement a more structured process for the candidate's review of materials prior to taking the final NRC Examination.

- Improve documentation of pre- and post-examination test reviews.

Finally, CECo will pursue further discussions with NRC staff regarding the timely presentation of examination scenarios to support pre-test validation and review.

If your staff has any questions or comments regarding this response, please refer them to Sara Reece-Koenig, Compliance Engineer, at (708) 515-7250.

Sincerely,

T.J. Kovach
Nuclear Licensing Manager

Attachment

cc: A. Bert Davis, Regional Administrator - Region III
      J. D. Smith, Senior Resident Inspector - Zion
      C. P. Patel, Project Manager - NRR