



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

June 4, 1990

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

Subject: In the Matter of R. L. Dickherber, License No. SOP-2365-E,  
Docket No. 55-5043, EA 90-031 and In the Matter of  
Commonwealth Edison Company, Quad Cities Nuclear Power  
Station, Docket Nos. 50-254 and 50-265, License Nos.  
DPR-29 and DPR-30 and EA 90-032

References: (a) J. Lieberman to Cordell Reed letter  
dated May 1, 1990.

(b) S.R. Lefstein to J. Lieberman letter  
dated April 13, 1990.

Mr. Davis:

This is in response to the reference (a) letter which states, in part, as follows:

"As a separate matter, please provide to the Regional Administrator Region III, your views concerning the adequacy of the company's controls for work hours in view of the information provided by Mr. Dickherber on page 13 of his answer."

Attachment A provides our discussion of work hour controls, as requested.

We have conducted a review of Mr. Dickherber's work hours. That review did not substantiate his statements concerning overtime. On June 1, 1990, Mr. Dickherber did submit a clarification and retraction of certain parts of the statements contained in his April 13, 1990 response. Attachment B provides a weekly summary of the hours worked by Mr. Dickherber from January 2, 1990 through the date (October 17, 1989) of the event that prompted these communiques.

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Finally, we believe that our controls over work hours have been effective and will continue to ensure a high level of compliance with the NRC's guidelines on overtime as well as provide assurances that our personnel are not working to the extent that fatigue would impair their performance.

If your staff has any questions or comments regarding this submittal, please refer them to Ms. Rita Stols (708) 515-7283.

Sincerely yours,

*Dennis Galle 6/4/90*

Dennis Galle  
Vice President  
BWR Operations

cc: J. Lieberman, Director, Office of Enforcement  
J. Zwolinski, Assistant Director, NRR  
L. Olshan, Project Manager, NRR  
W. Shafer, Branch Chief, RIII  
J. Hind, Section Chief, RIII  
Senior Resident Inspector, Quad Cities

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## ATTACHMENT A

### COMMONWEALTH EDISON CONTROLS OF HOURS WORKED

Commonwealth Edison's controls over the number of hours worked by its employees in nuclear power plants are divided into two categories depending on how the individual's activities affect the safety of plant operation. Personnel who are directly involved with the operation or maintenance of safety-related plant equipment are encompassed by a formal program for monitoring work hours in accordance with Generic Letters 82-12 and 83-14. Work hours for other personnel whose activities do not directly or immediately impact the safe operation of the plant are monitored by more traditional management techniques.

Currently, Commonwealth Edison's control over work hours for plant personnel who perform safety-related functions is implemented through Nuclear Operations Directive, OA.13, revision 0 dated December 31, 1989. This directive became fully effective on April 30, 1990. It incorporates the guidance contained in Generic Letter 82-12 and 83-14 and Commonwealth Edison's commitments in its NRC approved programs to control overtime hours.

The current Directive was developed following a comprehensive review of practices at each of our Nuclear Stations. Commonwealth Edison's adoption of the directive assures that overtime controls are applied uniformly to specific Station positions consistently throughout our Nuclear Stations. In addition to providing a consistent policy, the Directive expanded the scope of the coverage to include additional positions that were not included prior to formalizing our approach in Nuclear Operations Directive OA.13. Positions currently encompassed by this Directive includes the Operating crew, Maintenance crews, Fuel Handling Foreman (during fuel movement), one Radiation Protection and one Chemistry Technician. The Directive requires that deviations be approved by the Station Manager or responsible supervisor (for call-out situations) prior to deviating from the guidelines.

The current Directive also includes an oversight procedure to ensure compliance. That procedure requires that deviations from the Directive guidelines be reported to upper Station Management on a monthly basis and to senior Corporate Management on a semi-annual basis. Included in the reports are the number of personnel who exceeded the guideline. In addition, the report to senior Corporate management requires that actions to prevent recurrence be defined, if the guidelines were exceeded without proper approval.

For personnel who are not encompassed by the guidance contained in the Generic Letters, management relies on the traditional methods of both personal awareness and supervisory observation to ensure that individuals are not fatigued by working excessive hours. When individuals believe they are becoming fatigued or are so observed by their supervisors, the work assignments for those individuals are adjusted accordingly. For non-salaried employees, overtime sheets are required to be approved by Supervisors. This permits each Supervisor to review the hours worked by his/her subordinates during a two-week pay period and to adjust subsequent work schedules, if

Attachment A (continued)

appropriate. For salaried employees, during periods of high activity such as a Refueling Outage, individuals must complete special forms to receive compensation for extended hours. Because such compensation requires the approval of supervisory personnel, supervisors review extended hours worked and can adjust subsequent assignments accordingly. In addition, management monitors work group overtime hours on a quarterly basis. This enables management to identify work groups with substantial overtime and to use this information to plan future work activities. While this approach is less formal than required by the Directive, experience has shown that this approach is effective and appropriate for assuring that personnel do not work excessive hours as a matter of course.

As Mr. Dickherber's supplement has clarified, the effectiveness of Commonwealth Edison's controls of overtime hours is not contradicted by Mr. Dickherber's record of work hours. At the time of the incident, the Fuel Handling Foreman was not encompassed by the formal program for monitoring work hours covered by the Generic Letters. Nevertheless, in our response dated March 26, 1990, Commonwealth Edison noted that the numerical limits in the overtime guidelines were exceeded in a few of cases by no more than two hours based on NRC allowances for turnover. This conclusion has now been corroborated by Mr. Dickherber's clarification of June 1, 1990, in which he has clarified his previous statements regarding hours worked. That clarification essentially shows that from the beginning of 1989 until shortly before the Refueling Outage, Mr. Dickherber worked the normal hours for plant personnel, that shortly before the outage Mr. Dickherber took a vacation and that during the outage Mr. Dickherber worked the extended hours traditionally associated with refueling activities. For clarity, a summary of Mr. Dickherber's weekly hours are provided in Attachment B.

For these reasons, Commonwealth Edison believes that its programs for controlling overtime hours comply with the Commission's guidelines where applicable and otherwise provide effective work controls for individuals in nuclear power plants.

**ATTACHMENT B  
R. DICICHERBER 1989 WORK HOURS**

| 1989<br>Mon. thru Sun.<br>Period | PA Computer<br>Hours | Training<br>Hours | Other<br>Hours | Total | Vacation/Holiday<br>Hours | Comments                  |
|----------------------------------|----------------------|-------------------|----------------|-------|---------------------------|---------------------------|
| 01/02 - 01/08                    | 35.5                 |                   |                | 35.5  | 8                         | Holiday                   |
| 01/09 - 01/15                    | 35.5                 |                   |                | 35.5  |                           |                           |
| 01/16 - 01/22                    | 41.5                 |                   |                | 41.5  |                           |                           |
| 01/23 - 01/29                    | 36.0                 |                   |                | 36.0  |                           |                           |
| 01/30 - 02/05                    | 43.5                 |                   |                | 43.5  |                           |                           |
| 02/06 - 02/12                    | 45.0                 |                   |                | 45.0  |                           |                           |
| 02/13 - 02/19                    | 24.5                 |                   |                | 24.5  | 16                        | Holiday & 1 Vacation Day  |
| 02/20 - 02/26                    | 36.0                 |                   |                | 36.0  | 8                         | Holiday                   |
| 02/27 - 03/05                    | 54.0                 | 1                 |                | 55.0  |                           | Radiation Training        |
| 03/06 - 03/12                    | 41.5                 |                   | 7              | 48.5  |                           | Rockford                  |
| 03/13 - 03/19                    | 43.0                 |                   |                | 43.0  |                           |                           |
| 03/20 - 03/26                    | 35.0                 |                   |                | 35.0  | 8                         | Holiday                   |
| 03/27 - 04/02                    | 45.5                 |                   |                | 45.5  |                           |                           |
| 04/03 - 04/09                    | 26.0                 |                   |                | 26.0  |                           |                           |
| 04/10 - 04/16                    | 36.0                 |                   |                | 36.0  |                           |                           |
| 04/17 - 04/23                    | 35.5                 |                   |                | 35.5  |                           |                           |
| 04/24 - 04/30                    | 35.5                 | 8                 |                | 43.5  |                           | Conduct of Ops Training   |
| 05/01 - 05/07                    | 01.5                 | 40                |                | 41.5  |                           | Instp Training            |
| 05/08 - 05/14                    | 44.0                 |                   |                | 44.0  |                           |                           |
| 05/15 - 05/21                    | 44.0                 |                   |                | 44.0  |                           |                           |
| 05/22 - 05/28                    | 22.0                 |                   |                | 22.0  |                           |                           |
| 05/29 - 06/04                    | 32.5                 |                   |                | 32.5  | 8                         | Holiday                   |
| 06/05 - 06/11                    | 29.5                 |                   |                | 29.5  | 8                         | Vacation                  |
| 06/12 - 06/18                    | 45.0                 |                   |                | 45.0  |                           |                           |
| 06/19 - 06/25                    | 16.0                 |                   | 7              | 23.0  | 24                        | 3 Vacation Days, Rockford |
| 06/26 - 07/02                    | 36.0                 | 8                 |                | 44.0  |                           |                           |
| 07/03 - 07/09                    | 27.0                 |                   |                | 27.0  | 8                         | Holiday                   |
| 07/10 - 07/16                    | 57.0                 |                   |                | 57.0  |                           |                           |
| 07/17 - 07/23                    | 10.0                 | 40                |                | 50.0  |                           | Fuel Handling Training    |
| 07/24 - 07/30                    | 26.0                 | 40                |                | 66.0  |                           | Fuel Handling Training    |
| 07/31 - 08/06                    | 27.0                 | 40                |                | 67.0  |                           | Fuel Handling Training    |
| 08/07 - 08/13                    | 65.0                 |                   |                | 65.0  |                           |                           |
| 08/14 - 08/20                    | 37.0                 | 7                 |                | 44.0  |                           | Station Annual Retraining |
| 08/21 - 08/27                    | 40.5                 | 3                 |                | 43.5  |                           | Fitness for Duty Training |
| 08/28 - 09/03                    | 24.0                 |                   |                | 24.0  |                           |                           |
| 09/04 - 09/10                    | 0.0                  |                   |                | 0.0   | 40                        | Holiday & 4 Vacation Days |
| 09/11 - 09/17                    | 79.0                 |                   |                | 79.0  |                           |                           |
| 09/18 - 09/24                    | 61.0                 |                   |                | 61.0  |                           |                           |
| 09/25 - 10/01                    | 64.0                 |                   | 7              | 71.0  |                           | Rockford                  |
| 10/02 - 10/08                    | 56.0                 |                   |                | 56.0  |                           |                           |
| 10/09 - 10/15                    | 68.0                 |                   |                | 68.0  |                           |                           |
| 10/16 - 10/22                    | 60.0                 |                   |                | 60.0  |                           |                           |

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June 1, 1990

OUR FILE:

2379-1

FAX AND U.S. MAIL DELIVERY

James Lieberman, Esq.  
Director, Office of Enforcement  
OWPN 7H4  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Re: In the Matter of R. L. Dickherber  
License No. SOP-2365-8  
Docket No. 55-5043  
EA 90-131 and

In the Matter of Commonwealth Edison Company  
Quad Cities Nuclear Power Station  
Docket Nos. 50-254 and 50-256  
License Nos. DPR-29 and DPR-30  
EA 90-032

Dear Mr. Lieberman:

Submitted to you by FAX and thereafter by mail on June 1, 1990, is the Supplemental Answer of Robert L. Dickherber. We previously advised Mr. Berson of Region III that this document would be submitted, and in response to my inquiry, he advised that no motion for leave to file this document was necessary.

Also enclosed is a Proof of Service with an attached service list.

Thank you for your attention.

Sincerely,

*Stuart Lefstein*  
Stuart R. Lefstein

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SRL/mlh  
Encl.

KATZ, MCANDREWS,  
BALCH, LEFSTEIN & FIEWEGER, P.C.

James Lieberman, Esq.  
June 1, 1990  
Page 2

Copies by FAX and U.S. Mail to:

Mr. Charles Bechoefer, Chairman of Administrative Judges  
Assistant General Counsel for Hearings and Enforcement  
Regional Administrator, NRC Region III  
Sheldon L. Trubatch, Esq.  
Michael Miller, Esq.

Copies by U.S. Mail only to:

Secretary, U.S. Nuclear Regulatory Commission  
Senior Resident Inspector at Quad Cities Nuclear Power Station

UNITED STATES  
NUCLEAR REGULATORY COMMISSION


|                             |   |                              |
|-----------------------------|---|------------------------------|
| IN THE MATTER OF:           | ) | License No. SOP-2365-8       |
| R. L. DICKHERBER            | ) | Docket No. 55-5403           |
| -----                       | ) | EA 90-031                    |
| IN THE MATTER OF:           | ) |                              |
| COMMONWEALTH EDISON COMPANY | ) | License Nos. DPR-29 & DPR-30 |
| QUAD CITIES NUCLEAR POWER   | ) | Docket Nos. 50-254 & 50-256  |
| STATION                     | ) | EA 90-032                    |

PROOF OF SERVICE

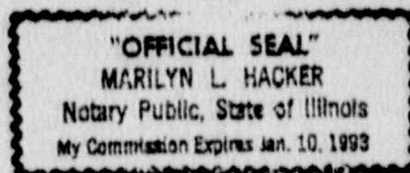
I, Stuart R. Lefstein, an attorney for Robert L. Dickherber, having been sworn on oath, state that copies of Supplemental Answer of Robert L. Dickherber were served upon the agencies and persons on the attached Service List by United States Mail, postage prepaid, on June 1, 1990. Additionally, copies of that Supplemental Answer were served by Fax on June 1, 1990 to the first six agencies or persons named on the attached service list.

  
Stuart R. Lefstein

Signed and sworn to before me, a Notary Public, this 1st day of June, 1990.

  
Marilyn L. Hacker  
Notary Public

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

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|                             | ) | Docket No. 55-5403           |
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| -----                       | ) |                              |
| IN THE MATTER OF:           | ) |                              |
|                             | ) | License Nos. DPR-29 & DPR-30 |
| COMMONWEALTH EDISON COMPANY | ) | Docket Nos. 50-254 & 50-256  |
| QUAD CITIES NUCLEAR POWER   | ) | EA 90-032                    |
| STATION                     | ) |                              |

SUPPLEMENTAL ANSWER OF ROBERT L. DICKHERBER

I, Robert L. Dickherber, hereby submit this Supplemental Answer, under oath, to the Answer that I previously filed on April 13, 1990. My reason for submitting this answer is that further information has come to my attention which I believe requires a withdrawal of certain statements previously made and a correction of misleading implications that may flow from those statements.

Specifically, in Section II C, appearing on p. 13 of my Answer, I made certain statements regarding time worked preceding the incident. The statements made were based on my best recollection and memory without having reviewed any time records, with one exception hereafter noted.

As a result of the Commission's directive to Commonwealth Edison to comment on the hours I worked, that company developed hours information based upon its computer showing entry access and exit to and from the Cordova Station. Commonwealth has now made

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this information available to me and my attorney.<sup>1</sup>

After reviewing this information, I find it necessary to withdraw and disavow the statements in the first two paragraphs in Section II C appearing on p. 13, except the first sentence which concludes that the incident "was probably occasioned by stress" and the middle sentence of the second paragraph relating to the cleaning of the fuel pool. A study of the hours information from the computer simply does not support my recollection of the average amounts of time I said I was working prior to the incident in question.<sup>2</sup>

It should be noted, however, that my estimates of work hours in those two paragraphs were offered as background information, and not as a cause of my conduct on the day of the incident. Unfortunately, because I did not regard my hours as a reason for my actions, verification of them did not loom as an

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<sup>1</sup> Commonwealth Edison and its counsel have been most cooperative in honoring reasonable requests for pertinent documents. Undoubtedly, had time records covering the periods mentioned in my Answer been requested Commonwealth would have supplied them. Indeed, prior to preparing my Answer and without any request, the Company had provided documents relating to my overtime hours from October 9 through October 21, 1989, and a computer report showing the times of my entrances and exits to and from the security area of the Cordova Station covering the period of October 2 through October 19, 1989. (Ex. 2 attached).

<sup>2</sup> The hours information developed from the computer shows time spent at the Cordova Station within the protected area, but not work hours as such. Attached as Exhibit 1 is a summary of information taken from the computer relating to the specific statements on p. 13 which I am now withdrawing. While I believe my hours worked were greater than the hours I was shown to be in the protected area, since at times I worked outside the protected area (again, see Ex. 1), these additional hours are not sufficient to substantiate my initial statements appearing in my Answer.

important consideration in preparing my Answer. However, upon further review of the first paragraph on p. 13, I can see how the proximity of the statements regarding my 1989 hours to the sentence that "the incident... was probably occasioned by stress" could convey an impression that the stress resulted from those hours. I am therefore specifically disavowing any such impression that might have been inadvertently created.<sup>3</sup> I apologize to the Commission and express my deepest regrets for having possibly created this impression and for relying on what is now shown to be a faulty memory with respect to my hours when they could and should have been verified, at least to the extent possible.<sup>4</sup>

I continue to believe, as previously stated, that "stress" "probably occasioned" the incident in question essentially because of the reasons set forth in the last paragraph commencing on p. 13 of my Answer. To a minimal extent my hours within the protected area in the immediate days<sup>5</sup> and week before the incident (which were 72.5 instead of 81, Ex. 2 attached) may possibly have influenced my conduct.

My misstatement that I worked 81 hours in the week immediately before the incident instead of 72.5, which is the number shown on

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<sup>3</sup> Note my statement in the last paragraph on p. 12 of my Answer relating to a dropped fuel bundle occurring in September 1989 which was handled according to proper procedures. Obviously, neither stress nor prior hours worked affected my performance on that occasion.

<sup>4</sup> See notes 1 & 2, supra.

<sup>5</sup> 16 hours on October 15 and 13 hours on October 16.

the computer, results from an incorrect reading and impression of a station management document (Ex. 2) first seen by me shortly after the incident. It was my impression that the 81 hours figure shown on the document represented the number of hours that I had worked during the week preceding the incident. Since filing my Answer on April 13, 1990, I have determined that the 81 hours figure, which appears next to arrows drawn between days, is the total hours I was in the protected area for 8 days prior to the incident instead of 7.

My attorney and I had a copy of Exhibit 2 available prior to preparing my Answer. Unfortunately, we failed to critically examine it and instead simply relied on my mistaken impression that it represented the hours for the week preceding the incident. My attorney and I both apologize for having not detected this incorrect impression when we had an opportunity to do so.

In attempting to assess the reasons for my inaccurate memory and recollection, I assume that I was influenced by hours worked during the month of September and that with respect to that month and earlier months I focused on the days where I worked long hours, and that those days then became exaggerated in my mind as the norm. For example, on September 13 I was in the protected area for 14 hours and in the 7-day period from Saturday, September 16 through Friday, September 22, the computer shows that I was in the protected area for 82.5 hours, with a 13.5 hour day on Saturday, a 13 hour day on Sunday, a 13 hour day on Thursday, a 12.5 hour day on Friday, and all days in that period at least 10 hours.

In the days immediately preceding the day of the incident the computer shows I was in the protected area for 16 hours on Sunday, October 15, and 13 hours on Monday, October 16. My inaccurate perception that I had worked 81 hours in the week preceding the incident probably also contributed to my incorrect statements about average hours.

Similarly, in earlier months I had a few days which were quite long. On August 7, 8, and 9, the computer shows my presence at the station for days of 18 hours, 11 hours, and 10 hours, respectively. My memory failed me in that I did not recall that for each of these long days I had numerous shorter days which reduced my overall average hours. (Again, see Ex. 1).

One final correction should also be noted. In Section I B, p. 3, I commented on a reduction in radiation exposure. This was based on my memory. Commonwealth has advised me of certain inaccuracies in these comments. The exposure drop between 1976 and 1977 was only 48%, not 62%, and from 1974 through 1977 the exposure rate had not exceeded 4 Rem, as I believed and stated. Additionally, while not discussed in my Answer, exposure rates returned to high levels for several years after 1977. This was because of new work that had not been previously required. Radiation exposure at high levels continued because of repair work done to tools and fuel handling equipment, especially the refuel bridge, and because of other work assignments. From 1985 through the present radiation exposure rates again dropped dramatically when contaminated materials were discarded.


Once again, my incorrect statements should have been subjected to critical verification before filing my Answer. At this time all I can do is set forth the actual facts as they have been brought to my attention and offer my sincere apologies to the Commission for these inaccuracies.

Respectfully submitted,

Robert L. Dickherber

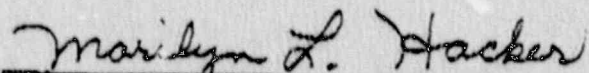
STATE OF ILLINOIS            )  
  ) SS.  
COUNTY OF ROCK ISLAND    )

Robert L. Dickherber, being first duly sworn on oath, states that he has read the foregoing statement and that all factual statements made in the same are true and correct to the best of his knowledge and belief.

  
Robert L. Dickherber

Signed and sworn to before me, a Notary Public, this 1st day of June, 1990.



  
Notary Public

Stuart R. Lefstein  
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BALCH, LEFSTEIN & FLEWEGER, P.C.  
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Phone: 309/788-5661

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

|                             |   |                              |
|-----------------------------|---|------------------------------|
| IN THE MATTER OF:           | ) | License No. SOP-2365-8       |
| R. L. DICKHERBER            | ) | Docket No. 55-5403           |
| -----                       | ) | EA 90-031                    |
| IN THE MATTER OF:           | ) |                              |
| COMMONWEALTH EDISON COMPANY | ) | License Nos. DPR-29 & DPR-30 |
| QUAD CITIES NUCLEAR POWER   | ) | Docket Nos. 50-254 & 50-256  |
| STATION                     | ) | EA 90-032                    |

EXHIBIT 1 TO SUPPLEMENTAL ANSWER OF ROBERT L. DICKHERBER

The following information, developed from Commonwealth Edison's security computer, is set forth to correct the misstatements appearing in my Answer:

The fuel outage occurred on or about September 10, 1989. I had been on vacation from September 1 through September 10. From September 11 through September 23 I was within the computer access area every day, including two Saturdays and one Sunday at an average of 10.8 hours per day with my longest day at 14 hours. From September 24 through September 30 I had one Sunday off and my average hours within the protected area were 10.67 per day with my longest day at 13 hours. From October 1 through October 17, which was the day of the incident, I had two Sundays off. My average hours in the protected area were 9.7 hours with my longest day at 16 hours.<sup>1</sup>

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<sup>1</sup> Also, and necessarily, the computer shows that generally my starting times were somewhat later than initially stated and my exit times were generally earlier than I had recalled and stated in the Answer. Sometimes there is approximately a 5 minute wait to gain access.



In the eight months prior to the fuel outage, the security computer shows my presence on the following weekends only: Sunday, February 19; Saturday, March 4; Saturday, March 11; Saturday, July 15; Sunday, July 30; Saturday, August 5; Sunday, August 6; and Saturday, August 12. My presence is not shown on any other weekend dates by the security computer during those months.

The average daily hours of my presence shown by the computer for the eight months prior to the outage was approximately eight. However, my average hours actually worked during those months is necessarily higher, although undoubtedly less than what I stated. The 8 hour average was arrived at by taking an average hours per day for each of 32 weeks of 1989 through the end of August, except the week of May 1,<sup>2</sup> as shown by the security computer. Certain weeks entering into this average contained average days substantially less than eight hours, such as 2, 4.3, 3.8, and 5.5. These numbers contributed to bringing the average down to 8, as reported.

However, it is highly probable that for most week days where the security computer showed me with an average of less than eight I was on job assignments elsewhere performing at least 8 hours of work for the entire day. As an example, during the summer of 1989, I spent approximately 3 weeks in license requalification training outside of the protected area. These hours do not show on the computer but are factored into the 8 hour daily average based only

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<sup>2</sup> I was in a management training program during that week outside of the protected area.

EXHIBIT 1 (CONTINUED)

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on the computer. Additionally, when I was taking this training I would usually spend several hours at home in the evening studying, which, of course, is not contained in the average.

Besides taking training, other work was performed outside of the protected area. During the fuel outage I wrote approximately five or six different fuel handling procedures at home. Commonwealth had never asked or suggested that I do this work at home but I did so in order to get the job done.

Also, I have escorted on several occasions Commonwealth personnel to medical offices in Rockford for alcohol and drug testing. A trip to Rockford from the Cordova Station and back with waits at the medical offices averages approximately six hours, and I probably was involved in such escorts during the eight month period prior to the incident approximately five times. I also had meetings with contractors outside of the station which are not shown on the computer records. I possibly had such meetings approximately three or four times during the periods involved with a range of time from two to four hours.

Since there is no documentation for the precise number of hours worked outside the protected area in the eight months prior to the outage, and based on the above information, it is reasonable to conclude that I was working an average of more than 8 hours per day but not 10 to 12 hours per day as stated, nor was I regularly working 6-day weeks.

Finally, I was substantially mistaken regarding my recollection of holidays worked. In addition to Memorial Day and

EXHIBIT 1 (CONTINUED)

4

Independence Day mentioned in my Answer, the computer shows me off on New Year's Day, Lincoln's Birthday, President's Day, Good Friday and Labor Day, which fell during my vacation. A holiday for which I am shown present is Columbus Day.

FOR PERSONS EXITING BETWEEN 10/01/89 00:00 AND 10/20/89 12:12

| CARD NO. | CARDHOLDER NAME  | STATION NUMBER | STATION DEPT | ENTRANCE DATE | ENTRANCE TIME | EXIT DATE | EXIT TIME | TIME SPENT | CUMULATIVE |
|----------|------------------|----------------|--------------|---------------|---------------|-----------|-----------|------------|------------|
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/02/89      | 06120         | 10/02/89  | 15127     | 9106133    | 9106133    |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/03/89      | 06125         | 10/03/89  | 16110     | 9144174    | 111110     |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/04/89      | 06127         | 10/04/89  | 16141     | 10113155   | 29105102   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/05/89      | 06132         | 10/05/89  | 15151     | 9119117    | 38124119   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/06/89      | 06131         | 10/06/89  | 15133     | 9101148    | 47126107   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/07/89      | 06141         | 10/07/89  | 15112     | 8131143    | 55157150   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/09/89      | 06133         | 10/09/89  | 15105     | 8132145    | 64130135   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/10/89      | 06136         | 10/10/89  | 17127     | 10151100   | 75121175   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/11/89      | 06136         | 10/11/89  | 16115     | 9139102    | 85100137   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/12/89      | 06132         | 10/12/89  | 17112     | 10139127   | 95140104   |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/13/89      | 06136         | 10/13/89  | 15135     | 8159112    | 104139116  |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/14/89      | 06119         | 10/14/89  | 09142     | 3123133    | 108102149  |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/14/89      | 22136         | 10/15/89  | 14150     | 16113148   | 124116137  |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/16/89      | 06120         | 10/16/89  | 18120     | 12158116   | 137115151  |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/17/89      | 06117         | 10/17/89  | 14156     | 8139134    | 145153127  |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/18/89      | 06113         | 10/18/89  | 14106     | 9152140    | 155148107  |
| 01856    | DICKHERBER ROBER | 128            | FUEL         | 10/19/89      | 06132         | 10/19/89  | 15117     | 8145103    | 164133110  |

17 RECORD(S) SELECTED

ENTEEEO 0637 10/20/89

EXHIBIT 2

56

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57