FENOC

FirstEnergy Nuclear Operating Company

5501 North State Route 2
Oak Harbor, Ohio 43449

. B. Bezilla
Vice President - Nuclear

419-321-7676
Fax: 419-321-7582

Docket Number 50-346
License Number NPF-3
Serial Number 1-1385

August 5, 2004

Mr. James L. Caldwell, Administrator
United States Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Subject: Submittal of Independent Assessment Plan for the Davis-Besse Nuclear Power Station Operations Performance, Revision 2

Dear Mr. Caldwell:

The purpose of this letter is to submit Revision 2 to the assessment plan and related information for the independent outside assessment of the Davis-Besse Nuclear Power Station (DBNPS) operations performance. The original Operations Performance Assessment Plan was submitted on May 17, 2004, via DBNPS letter Serial Number 1-1364 with Revision 1 submitted on June 30, 2004, via DBNPS letter Serial Number 1-1373.

In accordance with the Nuclear Regulatory Commission (NRC) letter, dated March 8, 2004, "Approval to Restart the Davis-Besse Nuclear Power Station, Closure of Confirmatory Action Letter, and Issuance of Confirmatory Order," (letter Log 1-4524), the DBNPS is submitting Revision 2 to the Operations Performance Assessment Plan, including the identification and qualifications of the assessors. Revision 2 is being submitted due to the refinement of the assessment scope and assessment methods.

This assessment remains scheduled to commence on August 16, 2004. The assessment length has been changed from one week to approximately one and one-half weeks. The above changes are identified with a revision bar in the right hand margin of the Attachment 2, Assessment Plan. Revision 2 of the Operations Performance Assessment Plan and the attached biographies supercedes the Revision 1 submittal in its entirety.

If you have any questions or require further information, please contact Mr. Clark A. Price, Project Manager - DBNPS 0350 Process and Confirmatory Order, at (419) 321-8585.

Sincerely yours,

JCS

Attachments

cc: USNRC Document Control Desk
J. A. Grobe, Chairman NRC 0350 Panel
DB-1 NRC/NRR Senior Project Manager
DB-1 Senior Resident Inspector
Utility Radiological Safety Board

COMMITMENT LIST

The following list identifies those actions committed to by FENOC's Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Manager - Regulatory Affairs (419-321-8450) at the DBNPS of any questions regarding this document or associated regulatory commitments.

COMMITMENTS	DUE DATE
None. Serial 1-1385 contains no new commitments.	N/A

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Attachment 2

Independent Operations Performance Assessment Plan, Revision 2

(4 pages to follow)

Operations Performance Assessment Plan – Revision 2

NUMBER:
2004-0098

ASSESSMENT AREA:
Operations Performance

PURPOSE:

To provide an independent and comprehensive assessment of Operations Performance at the Davis-Besse Nuclear Power Station. The assessment will be performed in accordance with the requirements of the March 8, 2004, Confirmatory Order Modifying License No. NPF-3, and Davis-Besse Business Practice DBBP-VP-0009, Management Plan for Confirmatory Order Independent Assessments. The assessment will be used to identify areas for improvement, requiring corrective actions with action plans, and observations for other improvement opportunities. The assessment will also be used to assess the rigor, criticality, and overall quality of available Davis-Besse internal self-assessment activities in this performance area.

SCOPE:

The Independent Assessment Team will evaluate the following Operations activities occurring during the assessment period using current industry standards and applicable Davis-Besse procedures:

- Shift turnover;
- Control manipulations;
- Communications;
- Interdepartmental interfaces;
- Procedural use;
- Awareness of plant and equipment status and workarounds;
- Pre-job/activity briefings;
- Non-shift Operations management interface and oversight;
- Shift management command and control;
- Shift management's evaluation, prioritization, and disposition of maintenance activities and emergent issues;
- Operations behaviors in the areas of questioning attitude and safety.
- Shift handling of off-normal operations.
- Observation of operator simulator training to compare crew performance, demeanor, and communication skills with actual control room operations.

The assessment team will review selected Condition Reports related to Operation's section performance and independently assess the corrective actions taken.

SCOPE Continued:

The assessment team will also review the referenced procedure/documents during the Preparation Period prior to site arrival.

The Assessment Team will also evaluate the effectiveness of the Davis-Besse Nuclear Power Plant's self-assessment activities associated with Operations performance.

a. Review the results of Davis-Besse Quarterly Quality Assessments that evaluated Operations performance. Determine if the assessments were comprehensive and were effective actions taken to correct problems or weaknesses identified.
b. Evaluate the effectiveness of self-assessment capability by reviewing corrective actions associated with self-assessment reports, audits (including audits of both onsite and offsite safety committee activities), and evaluations conducted on Operations performance. Evaluate the significance of a sample of other self-assessment findings to determine the effectiveness of the self-assessment effort.
c. Determine if the Davis-Besse Operations staff is aggressive in correcting self-assessment findings and determine whether the corrective actions are adequate, timely, properly prioritized, and that effectiveness reviews are ensuring the desired results.

INDEPENDENT ASSESSMENT TEAM:

- Larry E. Briggs, Silver Fox Synergies, LLC, Team Leader
- Paul H. Bissett, Silver Fox Synergies, LLC
- Freddie Forrest, Unit One Operations Manager, Arkansas Nuclear
- Gene St. Pierre, Station Director, Seabrook Station

Biographies attached.

SCHEDULE:

- May 4 through 14, 2004, develop, review and submit assessment plan to NRC.
- July 14, 2004, send selected documentation to team members to begin off-site preparations.
- August 15, 2004, assessment team will assemble near the plant for final assessment preparations.
- August 16 through 25, 2004, conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- Final team assessment report will be provided to Davis-Besse within 14 days after the completion of the on-site assessment.
- Final Davis-Besse assessment report and action plans (if required by findings) will be submitted to the NRC within 45 days of the completion of the on-site assessment.

ASSESSMENT METHODS:

The independent assessment team will use the listed references as guidance to evaluate performance of the Operations department. The assessment methodology will include, but is not limited to the following:

1. Observe Control Room, Non-Licensed and Operations Management personnel in the performance of their assignments. Assessment team member shift assignment will overlap shift turnovers to compare consistency of crew operations.
   - Minimum of 3 day shifts, 2 backshifts, and 2 deep backshifts.
   - Minimum of 2 shifts of non-licensed activities.

2. Interview selected Control Room, Non-Licensed, and Operations Management personnel.
   - Minimum of 4 licensed, 4 non-licensed, and 2 management.

3. Review selected Condition Reports (CR) and corrective actions to evaluate safety perspective, appropriate cause determination, and corrective action effectiveness. An Index of Operations related CRs would be provided during the off-site prep weeks.
   - Minimum of 5 Condition Reports.

4. Observation of simulator training during routine and abnormal operating condition using NUREG 1021 as guidance and as a comparison with actual Control room observations.

REFERENCES:

DB-OP-00000, "Conduct of Operations," MCR (Most Current Revision);
DB-OP-00004, "Operator Aids Control," MCR;
DB-OP-00005, "Operators Logs and Rounds," MCR;
DB-OP-00006, "Night Orders and Standing Order Log," MCR;
DB-OP-00016, "Temporary Configuration Control," MCR;
DB-OP-00018, "Inoperable Equipment Tracking Log," MCR;
DB-OP-00100, "Shift Turnover," MCR;
DB-OP-00200, "Shift Engineer," MCR;
DB-OP-01002, "Component Operation and Verification," MCR;
DB-OP-01003, "Operations Procedure Use Instructions," MCR;
DB-OP-01200, "Reactor Coolant Leakage Management," MCR;
DB-DP-00007, "Control of Work," MCR;
NG-DB-00018, "Operability Determinations," MCR;
NOP-WM-2001, "Work Management Process," MCR;
NOP-LP-2001, "Condition Report Process," MCR;
NOP-OP-1002, "Conduct of Operations," MCR;
GP-03, "Conduct of Pre-job Briefs and Post-job Reviews", MCR.

REFERENCES Continued:

Work Process Guideline (WPG) – 2, "Operations Equipment Issues," MCR;
NRC Inspection Procedure 71715, "Sustained Control Room and Plant Observation, MCR;
NRC Inspection Procedure 71707, "Plant Operations," MCR;
NRC Inspection Procedure 93802, "Operational Safety Team Inspection (OSTI)," MCR;
NRC Inspection Procedure 93806, "Operations Readiness Assessment Team Inspections," MCR;
An index of Condition Reports, sorted for Operations Department involvement, January 1, 2004, through July 2004;
The "Work Week Schedule" for the on-site assessment week;
The licensed operator training schedule for the on-site assessment week;
Last two Quality Assurance quarterly assessments;
Applicable recent self-assessments;
Applicable Company Nuclear Review Board minutes from last two CNRB intervals.

ASSESSMENT PLAN APPROVALS:

Prepared by: Larry E. Briggs Date: 8/2/04
Larry E. Briggs, Assessment Team Lead

Approved by: Clark A. Price Date: 8/2/04
Clark A. Price, Project Manager

Approved by: Ralph L. Hansen Date: 8/3/04
Ralph L. Hansen, Executive Sponsor

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Attachment 3

Independent Operations Performance Assessment Plan
Assessors and Qualifications

(4 pages to follow)

Larry E. Briggs
Independent Consultant
Silver Fox Synergies, LLC

- 2001 - Present: *Onsite Inc.*; Senior Consultant - Developed NRC written examination for the Oyster Creek Facility (May 2002 examination).
- 1977 - 2001: *U. S. Nuclear Regulatory Commission (NRC)*; Held various positions with the NRC. Duties included: Senior Operations Engineer (Chief License Examiner and Senior Inspector) - Certified Chief Examiner on General Electric (GE), Westinghouse, and Combustion Engineering plants. Responsible for review, oversight, and administration of licensed operator examinations. Scheduled and made personnel assignments for Region I licensed operator examinations and re-qualification inspections. Responsible for leading team inspections as assigned, such as maintenance rule and for cause re-qualification inspections. Also led numerous NRC routine operator licensing examination teams and re-qualification inspections. Participated in nuclear event response both in Region 1 and at the facility.
- NRC Senior Resident Inspector - Responsible for NRC inspection program at assigned facility and maintained constant interface with utility and NRC concerning plant activities and status; Senior Engineer - Responsible for oversight of NRC pre-operational testing inspection program for Region I facilities; Project Engineer - Responsible for general inspection of assigned NRC Region I facilities and coordinated NRC inspection activities at assigned facilities.
- 1972 - 1977: *Burns and Roe Inc*; Senior Startup Engineer - Responsible for development, implementation, and coordination of pre-operational test and startup procedures for assigned systems at Three Mile Island (TMI) Units 1 and 2. Also, provided on-site engineering resolution to Unit 2 problem reports during construction.
- 1960 - 1972: *U. S. Navy*; Leading CPO (USS Whale SSN 638) for Reactor Control Division. Leading In-hull instructor/Reactor Control Division Officer on D1G Prototype. Engineering Office of the Watch (EOOW) qualified on D1G Prototype. Qualified on S3G Prototype, S2Wa, and S5W Navy power plants.

Paul Bissett
Independent Consultant
Silver Fox Synergies, LLC

- 1989-2003: *U. S. Nuclear Regulatory Commission (NRC)*; Senior Operations Engineer (Chief License Examiner/Inspector) - Certified Chief Examiner on Babcock and Wilcox (1990), Westinghouse (1988) and General Electric (1999) facilities. Effectively led and conducted licensing examinations, and requalification examinations/inspections at Region I facilities.
  Assisted in the administration of operator licensing examinations in Region II (Surry) and Region III (Davis-Besse).

  Responsible for leading team inspections, including, but not limited to, operator licensing requalification, maintenance rule, problem identification and resolution, Event-V, PRA, Emergency Operating Procedure (EOPs) and operational startup inspections.

  Participated in numerous Region I plant restart inspections (TMI-1, IP-2, Salem 1/2, etc.), primarily focusing on operational safety assessments.
- 1982-1989: *U. S. Nuclear Regulatory Commission (NRC)*; Responsible for the conduct of reactor operations inspections, including the areas of maintenance, surveillance and calibration, and in-service testing of pumps and valves, including the review and approval of a licensee's 10 year In-service Test program submittal. Responsible for the review of licensee QA plan submittals and subsequent inspection of licensee QA/QC programs.
- 1977-1982: *U. S. Nuclear Regulatory Commission (NRC);* Responsible for the accountability and security of special nuclear materials at fuel fabricating facilities, including the decommissioning of one major nuclear facility, utilizing non-destructive assay techniques.
- 1970-1976: *U. S. Navy*; Four year assignment on the USS California (CGN-36) included the participation in the construction and testing of the engineering plant, nuclear core installation, pre-critical testing, initial criticality, power range testing and sea trials. As the Leading Machinery Watch (LMW), supervised aft engine room mechanical work activities. Administered preventive maintenance program.

Freddie Forrest
Operations Manager
Arkansas Nuclear (ANO) - Unit One

- 2003 - present: *ANO-Unit One (B&W)*; Operations Manager - Provides planning, direction and overall supervision of Unit One Operations Department.
- 2002 - 2003: *ANO-Unit 2 (CE plant);* I&C Superintendent - Ensured accountability in accordance with established standards and expectations including efficient and timely work scheduling, comprehensive outage preparation, attention to detail, ALARA considerations, compliance with quality assurance requirements, and aggressive corrective actions.
- 2001 - 2002: *Institute of Nuclear Power Operations (INPO)*; Operations Evaluator - Part of team that evaluated the operations, maintenance, work management, human performance, industrial safety and safety culture at nuclear power plants. Lead teams of operation and training evaluators to evaluate operating crews on plant specific simulators.
- 2000 - 2001: *ANO-Unit 2 (CE plant)*; Assistant Project Manager Unit 2 Steam Generator Replacement - Coordinated the scheduling and interface of departments/groups and contract personnel during Unit 2 S/G replacement outage. Assistant Operations Manger - assist the Operations Manager in planning, direction, control and overall supervision of Operations.
- 1998 - 2000: *ANO-Unit 2 (CE plant)*; Shift Manager - Managed operations of 900-megawatt electric nuclear generating station. Analyzed and resolved operating problems to ensure continuity and economy of operations within Technical Specifications and corporate policy. Responsible for safe operation, adherence to procedures and regulatory requirements. Ensured Operating Crew was properly trained an qualified to perform duties, supervised preparation of work schedules and records for nuclear plant operating personnel to assure effective administrative control.
- 1996 - 1998: *ANO-Unit 2 (CE plant)*; Planning and Scheduling Liaison - Responsible for managing, planning and directing on-line maintenance activities to ensure compliance with probabilistic risk assessment and business goals. Responsible for implementation of forced outage schedules a transition from outage to on-line maintenance activities.
- 1992 - 1996: *ANO-Unit 2 (CE plant)*; Control Room Supervisor - Supervised licensed and non-licensed operators, directed performance of normal, abnormal, and emergency procedures to maintain plant in a safe condition, and approved all plant safety tagging and work order releases.
- 1988 - 1991: *ANO-Unit 2 (CE plant)*; Reactor Operator - Responsible for reactivity manipulations and operations of secondary plant equipment to produce electricity. Monitored plant instrumentation to maintain unit in a safe condition.
- 1984 - 1988: *ANO-Unit 2 (CE plant)*; Waste Control Operator - Responsible for all operational activities executed outside of the control room associated with reactor auxiliary components and systems including radioactive waste treatment.
- 1981 - 1984: *ANO-Unit 2 (CE plant)*; Auxiliary Operator - Responsible for all operational activities executed outside of the control room associated with secondary auxiliary components and systems.

Gene St. Pierre
Station Director
Seabrook Station

- 2000 - present: *Seabrook Station*; Station Director - Responsible for the following departments: Operations, Mechanical and Electrical Maintenance, I&C, Planning and Scheduling, Chemistry, Health Physics, Radiological Waste, Outage Management, Training, Modifications and Projects and administrative staff. Chairman of the Station Operating Review Committee (SORC) and member of the Station's Nuclear Safety Advisory Review Committee (NSARC).
- 1996 - 2000: *Seabrook Station;* Operations Manager - Responsible for all licensed activities on a day to day operational basis and the senior licensed individual for the Station. Member of the Station Resource Review Committee and Management Review Team.
- 1992 - 1996: *Seabrook Station*; Assistant Operations Manager for North Atlantic Energy Service Corporations, the managing agent for Seabrook Station and Northeast Utilities Company - Responsible for overall management of the individuals who hold NRC licenses to operate the controls of Seabrook Station. Also responsible for departmental budget planning. Served on the Station Modification Resource Committee and Station Operating Review Committee.
- 1986 - 1992: *Seabrook Station*; Shift Manager - Senior management representative on shift, providing management direction to station personnel. Shift superintendent for hot functional testing and initial reactor criticality (startup). Also, functioned as the senior license holder for initial core load.
- 1982 - 1986: *Seabrook Station*; Unit Shift Supervisor - Responsibilities included review of test startup procedures, Final Safety Analysis review and supervision of the development of plant operating procedures necessary to obtain an operating license.
- 1979 - 1982: *Seabrook Station*; Control Room Operator - Involved in cold licensing training for a Senior Nuclear Regulatory license to operate the controls of Seabrook Station.
- 1977 - 1979: *Yankee Atomic Power Station*; Nuclear Systems Operator - Responsible for safe operation of conventional and nuclear support systems for the electrical generating plant. Actively participated in two reactor refuelings including fuel inspection, fuel movements.
- 1971 - 1977: *U. S. Navy*; Served six years as an enlisted man attaining the rank of First Class Petty Officer. Assigned to the USS Sam Rayburn, a nuclear powered ballistic missile submarine. Served as the electrical division leading petty officer, Engineering Duty Chief, Engineering Watch Supervisor. Received a Commanding Officer's Commendation for outstanding qualifications and electrical division leadership, which resulted in an above average operational reactor safeguards inspection for the submarine.