

September 7, 2004

Mr. Mark B. Bezilla  
Vice President - Nuclear, Davis-Besse  
FirstEnergy Nuclear Operating Company  
Davis-Besse Nuclear Power Station  
5501 North State Route 2  
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION - INSPECTION SCHEDULE  
UPDATE

Dear Mr. Bezilla:

The purpose of this letter is to provide you with a schedule of U.S. Nuclear Regulatory Commission (NRC) inspections at the Davis-Besse Nuclear Power Station so you will have an opportunity to prepare for the inspections or inform us of any conflicts between planned inspections and significant plant activities. This letter is an update to our previous inspection schedule letter dated March 8, 2004. The enclosed inspection plan details the expanded baseline inspections scheduled at Davis-Besse through March 31, 2006. The NRC also plans to continue its special inspections at Davis-Besse as discussed and described in our March 8, 2004, inspection schedule letter.

On April 29, 2002, we informed you of the formation of the NRC's Davis-Besse Oversight Panel (Panel) under NRC Inspection Manual Chapter (IMC) 0350, "Oversight of Operating Reactor Facilities in a Shutdown Condition with Performance Problems." NRC oversight of performance at Davis-Besse continues to be provided by the Davis-Besse Oversight Panel pursuant to IMC 0350. While evaluation of plant performance under the routine Reactor Oversight Process (ROP) remains suspended, the Panel continues to use the ROP for guidance in directing NRC activities at Davis-Besse. On March 8, 2004, the NRC issued a letter lifting its restriction on restart of the Davis-Besse reactor along with a Confirmatory Order that requires annual independent assessments for 5 years in the areas of operations, engineering, corrective actions and safety culture. The Confirmatory Order also requires inspection of key reactor coolant system pressure boundary components during the 2005 mid-cycle outage.

Following restart of Davis-Besse, the Oversight Panel approved an inspection strategy integrating routine NRC baseline inspections with expanded baseline inspections in the areas of corrective action program implementation and NRC performance indicators, and special inspections to evaluate compliance with the Confirmatory Order and implementation of the commitments made in Appendices A and D of the "Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station and Request for Restart Approval" and the "Davis-Besse Nuclear Power Station Operational Improvement Plan Operating Cycle 14." Revision 5 to that Improvement Plan was submitted to the NRC on June 23, 2004. The schedule for expanded baseline inspections is included in Enclosure 1.

M. Bezilla

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Enclosure 2 details enhanced inspections we plan to perform to gain perspective in areas monitored by NRC Performance Indicators (PIs) where the Oversight Panel has determined that the PIs do not provide sufficient insight into plant performance because of the extended shutdown. The specific PIs for which inspection is enhanced are Unplanned Scrams, Scrams with Loss of Normal Heat Removal, Unplanned Power Changes, Emergency AC Power System Unavailability, High Pressure Injection System Unavailability, Heat Removal System Unavailability, Safety System Functional Failures, Reactor Coolant System Activity, and Reactor Coolant System Leakage. Inspection Procedure 71150, "Discrepant or Unreported Performance Indicator Data," will be used as guidance in determining the necessary level of additional inspection.

During the upcoming mid-cycle outage, the NRC plans to evaluate your inspection activities for leakage from the reactor coolant system, including the upper head and its pressure-retaining components, lower head incore monitoring instrumentation nozzles, and the pressurizer safety and relief nozzles and the surge line nozzle.

The enclosed inspection schedule is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 12 months of the inspection plan are tentative and may be revised at the end-of-cycle review meeting.

Inspection findings under the routine Reactor Oversight Process are normally included in performance assessments for 4 calendar quarters or until appropriate corrective actions have been completed, whichever is greater. The Oversight Panel has assessed significant inspection findings and has concluded that appropriate corrective actions have been completed. However, the Panel determined that the Red Finding initially characterized during the 1st quarter of CY 2003 regarding the degraded reactor vessel head, the Yellow finding initially characterized during the 3rd quarter of CY 2003 regarding control of containment foreign materials, and the White finding initially characterized during the 3<sup>rd</sup> quarter of CY 2003 regarding the high pressure injection pump design deficiency, will be carried forward in the assessment process while Davis-Besse is under the IMC 0350 process.

The NRC's Davis-Besse Oversight Panel will remain in place to monitor plant activities and meet periodically with FirstEnergy Nuclear Operating Company officials and the public until the agency is satisfied that the plant's performance warrants resuming routine regulatory oversight under the ROP. Prior to returning to the normal assessment program in accordance with IMC 0305, "Operating Reactor Assessment Program," we will notify you if the above findings will be carried forward in the ROP Action Matrix.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Christine A. Lipa, Chief, Branch 4, Division of Reactor Projects, at 630-829-9619 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

**/RA/**

John A. Grobe, Chairman  
Davis-Besse Oversight Panel

Docket No. 50-346  
License No.

- Enclosures: 1. Davis-Besse Inspection/Activity Plan  
2. List of Enhanced Inspections for NRC Performance Indicators (PIs)

cc w/encls: The Honorable Dennis Kucinich  
G. Leidich, President - FENOC  
Plant Manager  
Manager - Regulatory Affairs  
M. O'Reilly, Attorney, FirstEnergy  
Ohio State Liaison Officer  
R. Owen, Administrator, Ohio Department of Health  
Public Utilities Commission of Ohio  
President, Board of County Commissioners  
Of Lucas County  
C. Koebel, President, Ottawa County Board of Commissioners  
D. Lochbaum, Union Of Concerned Scientists  
J. Riccio, Greenpeace  
P. Gunter, N.I.R.S.

DOCUMENT NAME: C:\Documents and Settings\rld2\Desktop\inspection schedule ltr.wpd

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

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Institute of Nuclear Power Operations (INPO)

**Davis-Besse**  
**Inspection / Activity Plan**  
09/01/2004 - 03/31/2006

Enclosure 1

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>TI ON SW - TI 2515/159: GL 89-13 SERVICE WATER</b>		<b>3</b>			
1	IP 2515/159	Review of Generic Letter 89-13: Service Water System Problems Affecting Safety-Related E		10/04/2004	10/08/2004	Safety Issues
	<b>FPI - FIRE PROTECTION TRIENNIAL</b>		<b>3</b>			
1	IP 7111105T	Fire Protection		08/30/2004	09/17/2004	Baseline Inspections
1	IP 93812	Special Inspection		08/30/2004	09/17/2004	Event Response Insp
	<b>71121.02 - ACCESS CONTROL, ALARA</b>		<b>1</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/25/2004	10/29/2004	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		10/25/2004	10/29/2004	Baseline Inspections
	<b>71111.11 - LIC OPERATOR REQUAL PROGRAM EVALUATION</b>		<b>2</b>			
1	IP 7111111B	Licensed Operator Requalification Program		11/15/2004	11/19/2004	Baseline Inspections
	<b>71152B - PROBLEM ID &amp; RESOLUTION</b>		<b>4</b>			
1	IP 71152B	Identification and Resolution of Problems		11/29/2004	12/17/2004	Baseline Inspections
1	IP 93812	Special Inspection		11/29/2004	12/17/2004	Event Response Insp
	<b>7112202 - RAD WASTE/TRANSPORTATION</b>		<b>1</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		12/06/2004	12/10/2004	Baseline Inspections
1	IP 7112202	Radioactive Material Processing and Transportation		12/06/2004	12/10/2004	Baseline Inspections
1	IP 71151	Performance Indicator Verification		12/06/2004	12/10/2004	Baseline Inspections
	<b>ISI - MID-CYCLE ISI SPECIAL INSPECTION</b>		<b>2</b>			
1	IP 2515/150	Reactor Pressure Vessel Head and Vessel Head Penetration Nozzles (NRC Bulletin 2002-0:		01/17/2005	01/28/2005	Safety Issues
1	IP 2515/152	Reactor Pressure Vessel Lower Head Penetration Nozzles (NRC Bulletin 2003-02)		01/17/2005	01/28/2005	Safety Issues
1	IP 7111108P	Inservice Inspection Activities - PWR		01/17/2005	01/28/2005	Baseline Inspections
1	IP 93812	Special Inspection		01/17/2005	01/28/2005	Event Response Insp
	<b>71121.02 - ALARA, ACCESS CONTROL</b>		<b>1</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		01/31/2005	02/04/2005	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		01/31/2005	02/04/2005	Baseline Inspections
	<b>SSDPC - SAFETY SYSTEM DESIGN &amp; PERFORMANCE</b>		<b>6</b>			
1	IP 7111121	Safety System Design and Performance Capability		04/18/2005	05/06/2005	Baseline Inspections
	<b>MAINT - BIENNIAL MAINTENANCE RULE INSPECTION</b>		<b>1</b>			
1	IP 7111112B	Maintenance Effectiveness		05/16/2005	05/20/2005	Baseline Inspections
	<b>71114 - EP EXERCISE &amp; EP PI INSP</b>		<b>3</b>			
1	IP 7111401	Exercise Evaluation		05/16/2005	05/20/2005	Baseline Inspections
1	IP 71151	Performance Indicator Verification		05/16/2005	05/20/2005	Baseline Inspections
	<b>FY 2005 - DAVIS-BESSE INIT PREP 01/2005</b>		<b>3</b>			
1	W90112	OL - INITIAL EXAM - DAVIS-BESSE		06/27/2005	07/01/2005	Not Applicable

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

**Davis-Besse**  
**Inspection / Activity Plan**  
 09/01/2004 - 03/31/2006

Enclosure 1

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>FY 2005</b>	<b>- DAVIS-BESSE INIT EXAM 02/2005</b>	<b>3</b>			
1	W90112	OL - INITIAL EXAM - DAVIS-BESSE		07/18/2005	07/29/2005	Not Applicable
	<b>71121.03</b>	<b>- INSTRUMENTATION, PI VERIFICATION</b>	<b>1</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		09/19/2005	09/23/2005	Baseline Inspections
1	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		09/19/2005	09/23/2005	Baseline Inspections
1	IP 71151	Performance Indicator Verification		09/19/2005	09/23/2005	Baseline Inspections
	<b>71152B</b>	<b>- PROBLEM ID &amp; RESOLUTION</b>	<b>4</b>			
1	IP 71152B	Identification and Resolution of Problems		11/28/2005	12/16/2005	Baseline Inspections
	<b>ISI</b>	<b>- DAVIS BESSE ISI INSPECTION</b>	<b>2</b>			
1	IP 7111108P	Inservice Inspection Activities - PWR		01/02/2006	02/02/2006	Baseline Inspections
	<b>71122.01</b>	<b>- EFFLUENTS</b>	<b>1</b>			
1	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		02/06/2006	02/10/2006	Baseline Inspections
	<b>MOD/5059</b>	<b>- MODIFICATIONS AND 50.59</b>	<b>3</b>			
1	IP 7111102	Evaluation of Changes, Tests, or Experiments		02/27/2006	03/03/2006	Baseline Inspections
1	IP 711117B	Permanent Plant Modifications		02/27/2006	03/03/2006	Baseline Inspections

This report does not include INPO and OUTAGE activities.  
 This report shows only on-site and announced inspection procedures.

## **List of Enhanced Inspections for NRC Performance Indicators (PIs)**

### Initiating Events Cornerstone:

Key attributes that impact **Unplanned Scrams per 7000 Critical Hours, Scrams with Loss of Normal Heat Removal, and Unplanned Power Changes per 7000 Critical Hours PIs** are human performance, procedure quality, and equipment performance. Additional inspection samples will be completed during the performance of Inspection Procedures regarding Maintenance Effectiveness (71111.12), Problem Identification and Resolution (71152), Personnel Performance During Nonroutine Evolutions and Events (71111.14), and Operator Workarounds (71111.16).

### Mitigating System Cornerstone:

Key attributes that impact the **Safety System Functional Failures and Safety System Unavailability PIs for the Emergency AC Power System, High Pressure Injection System, and Heat Removal System** are human performance, procedure quality, configuration control, and equipment performance. Additional inspection samples will be completed during the performance of Inspection Procedures regarding Equipment Alignment (71111.04S), Equipment Alignment (71111.04Q), Problem Identification and Resolution (71152), Surveillance Testing (71111.22), Post Maintenance Testing (71111.19), Permanent Plant Modifications (71111.17), and Temporary Plant Modifications (71111.23).

### Barrier Integrity Cornerstone:

Key attributes that impact the **Reactor Coolant System Specific Activity and Reactor Coolant System Identified Leak Rate PIs** are cladding performance, reactor coolant system and barrier performance, human performance, procedure quality, design control, and configuration control. Additional inspection samples will be completed during the performance of Inspection Procedures regarding Surveillance Testing (71111.22).