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Docket Number 50-346

License Number NPF-3

Serial Number 3104

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United States Nuclear Regulatory Commission  
Document Control Desk  
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Subject: Correction of Performance Indicator Data for the Davis-Besse Nuclear Power Station  
Alert and Notification System

Ladies and Gentlemen:

On August 13, 2004, the FirstEnergy Nuclear Operating Company (FENOC) submitted to the NRC a letter (Serial Number 3084) discussing the failure of the Davis-Besse Nuclear Power Station (DBNPS) Emergency Preparedness Zone (EPZ) sirens on May 7, 2004. This letter provided FENOC's basis for increasing the testing frequency of the sirens from monthly to every normal working day in order to improve the reliability of the sirens.

Following FENOC's submittal of the 2004 Second Quarter Performance Indicator Data for the DBNPS, the NRC notified FENOC by letter dated October 21, 2004 that the Alert and Notification System (ANS) Performance Indicator was discrepant. The NRC conducted an inspection the week of October 25, 2004 to review FENOC's activities in response to the testing failure, and to gather information associated with the testing failure and associated root causes. During the course of this inspection, the NRC inspectors stated that FENOC personnel had misinterpreted certain requirements of NEI 99-02 Revision 02, "Regulatory Assessment Performance Indicator Guideline," as it applied to ANS siren testing. In particular, since the DBNPS Emergency Operations Facility (EOF) is not "normally attended" in that it is not occupied 24 hours a day, seven days a week, tests initiated from the EOF cannot be credited towards the ANS Performance Indicator. Additionally, the inspectors noted several other discrepancies with the performance of siren testing that affect the Performance Indicator values previously submitted to the NRC.

As a result, the following changes to the DBNPS ANS Siren Testing have been made:

- The daily silent test implemented in June 2004 from the EOF will not be credited towards the ANS Performance Indicator because the test was initiated from the EOF.
- The silent test performed weekly by the Ottawa County Sheriff will not be credited towards the ANS Performance Indicator because the equipment used for the test is not currently listed in procedures as a backup station for activating the sirens.

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- The five sirens located in Lucas County will not be credited towards the ANS Performance Indicator when they are sounded by Lucas County personnel, since the DBNPS Emergency Plan only directs these sirens to be sounded by Ottawa County personnel. The forty-nine sirens located in Ottawa County are credited towards the ANS Performance Indicator since they are sounded by Ottawa County personnel.

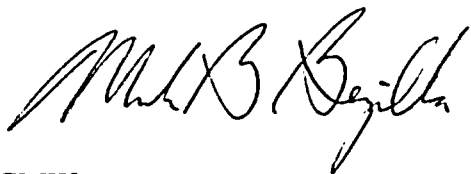
However, the 3-minute test of all 54 sirens in March 2004 for Tornado Awareness Week was a satisfactory test, since all 54 sirens were sounded by Ottawa County personnel.

Accordingly, it is necessary to correct the previous four quarters of data reported for the DBNPS ANS Performance Indicator. Attachment 1 to this letter contains the recalculated ANS Performance Indicator Data, which shows an indicator value of 92.37 percent for the Second and Third Quarters of 2004, corresponding to a white indicator. FENOC is submitting this recalculated data to assist the NRC in updating the values shown on the NRC web page for the ANS Performance Indicator. This recalculated data will also be electronically submitted to the NRC in accordance with NEI 99-02.

Due to the more timely identification of problems afforded by testing the ANS sirens every working day and the positive impact on siren reliability, FENOC plans on continuing this daily testing. FENOC is working with local authorities to have this testing performed from a normally attended station that is identified in procedures as either a primary or backup activation point. Once these changes are made to the siren testing program and are approved by the Federal Emergency Management Agency (FEMA) as necessary, FENOC will incorporate this data in the ANS Performance Indicator in accordance with the guidance of NEI 99-02.

Should you have any questions or require additional information, please contact Mr. Robert W. Schrauder, Director – Performance Improvement, at (419) 321-7181.

Sincerely yours,



GMW

Attachment 1: Corrected Alert and Notification System Siren Test Data

Attachment 2: Commitment List

cc: J. L. Caldwell, Regional Administrator, NRC Region III  
J. B. Hopkins, DB-1 Senior NRC/NRR Project Manager  
C. S. Thomas, DB-1 Senior NRC Resident Inspector  
K. R. Riemer, Plant Support Branch Chief, NRC Region III  
C. O'Claire, Radiological Branch Chief, Ohio Emergency Management Agency  
Utility Radiological Safety Board

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Corrected Alert and Notification System Siren Test Data  
for the Davis-Besse Nuclear Power Station

Quarter	Successful Siren Tests	Total Siren Tests	4-Quarter Total	Performance Indicator Value
2003Q3	147	147		
2003Q4	147	147		
2004Q1	201	201		
2004Q2	98	147	593/642	92.37%
2004Q3	147	147	593/642	92.37%

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### COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Director – Performance Improvement (419) 321-7181 at Davis-Besse of any questions regarding this document or associated regulatory commitments.

#### COMMITMENTS

Electronically submit recalculated data for the ANS Performance Indicator to the NRC in accordance with NEI 99-02.

#### DUE DATE

November 19, 2004