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Docket Number 50-346
License Number NPF-3
Serial Number 1-1406

March 15, 2005

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 - Year 2005

Dear Mr. Caldwell:

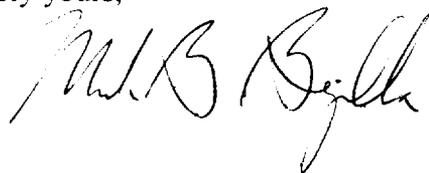
The purpose of this letter is to submit the assessment plan and related information for the year 2005 independent external assessment of the Davis-Besse Nuclear Power Station (DBNPS) operations performance. The Nuclear Regulatory Commission (NRC) letter, dated March 8, 2004, "Approval to Restart the Davis-Besse Nuclear Power Station, Closure of Confirmatory Action Letter, and Issuance of Confirmatory Order," (letter DBNPS Log 1-4524) requires submittal of the identity of the external assessment organization, including the qualifications of the assessors, and the scope and depth of the assessment plan, ninety (90) days prior to the assessment.

In accordance with the Confirmatory Order, the FirstEnergy Nuclear Operating Company (FENOC) is submitting the Operations Performance Assessment Plan, including the identification and qualifications of the assessors. This Assessment is scheduled to commence on June 13, 2005, with the onsite portion of the assessment lasting approximately two weeks. A final debrief marking the end of the assessment will be conducted with the DBNPS staff within 14 days of completion of the onsite assessment and the final assessment report and action plans, if required, will be submitted to the NRC within 45 days of the final debrief.

If you have any questions or require further information, please contact Mr. Clark A. Price, Manager - Regulatory Compliance, at (419) 321- 8585.

Sincerely yours,

JCS



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Attachments

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

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COMMITMENT LIST

The following list identifies those actions committed to by the 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 Compliance at (419) 321-8585 at the DBNPS with any questions regarding this document or associated regulatory commitments.

<u>COMMITMENTS</u>	<u>DUE DATE</u>
None.	N/A

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Attachment 2

Independent Operations Performance Assessment Plan

(5 pages to follow)

Operations Performance Assessment Plan 2005

NUMBER:

COIA-OPS-2005

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. The final assessment report will provide a conclusion of the effectiveness of the assessed areas, using rating categories. In addition the assessment will compare this year's Operations Performance with that observed during the 2004 assessment.

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 Operation's management interface and oversight;
- Shift management command and control;
- Shift management's evaluation, prioritization, and disposition of maintenance activities and emergent issues;
- Operation's 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 Operations Section performance and independently assess the corrective actions taken.

Operations Performance Assessment Plan 2005

SCOPE Continued:

The Assessment Team will also review the Condition Reports initiated to address the ten Areas for Improvement that were identified during the August 2004 Operations Performance Assessment.

The Assessment Team will also evaluate the effectiveness of the Davis-Besse Nuclear Power Station's self-assessment activities associated with Operations Performance as follows:

- a. Review the results of Davis-Besse Quarterly Quality Assessments that evaluated Operations Performance. Determine if the assessments were comprehensive and if effective actions were 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 of 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, Independent Consultant to Silver Fox Synergies, LLC, Team Leader
- Paul H. Bissett, Independent Consultant to Silver Fox Synergies, LLC
- Tracy Rhodes, Nuclear Operations Work Process Manager, McGuire.
Participation - week of June 13 only.
- Freddie Forrest, Operations Manager, Arkansas Nuclear One - Unit 1.
Participation - week of June 13 only.

Biographies attached.

SCHEDULE:

- February 23 through March 15, 2005: Develop, review and submit assessment plan to NRC.
- May 13, 2005: Send selected documentation to team members to begin off-site preparations.
- June 12, 2005: Assessment Team will assemble near the plant for final assessment preparations.

Operations Performance Assessment Plan 2005

- June 13 through June 24, 2005: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- The Assessment Team will provide a draft assessment report to and conduct a Final Debrief with Davis-Besse within 14 days after the completion of the assessment execution week(s). The Final Debrief will conclude the assessment.
- The final assessment report will be provided to Davis-Besse within seven (7) days following completion of the Final Debrief.
- The final Davis-Besse assessment report and action plans (if required by findings) will be submitted to the NRC by Davis-Besse within 45 days of the completion of the 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 assignments will overlap shift turnovers to compare consistency of crew operations.
 - Observe portions of at least three (3) day shifts, two (2) backshifts, and two (2) weekend shifts.
 - Observe portions of at least two (2) shifts of non-licensed activities.
2. Interview selected Control Room, Non-Licensed, and Operations Management personnel.
 - Minimum of five (5) licensed, five (5) non-licensed, and two (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 will be provided during the off-site preparation weeks.
 - Minimum of five (5) Condition Reports.
4. Review Action Plan Corrective Actions initiated to address the ten Areas for Improvement that were identified during the August 2004 Operations Assessment to evaluate the scope and effectiveness of the corrective actions implemented.
5. Observation of simulator training during routine and abnormal operating conditions using NUREG-1021 as guidance and as a comparison with actual Control Room observations. The team will observe and evaluate licensed and non-licensed operator continuing training classroom instruction, including resolution of feedback concerning student comments.

Operations Performance Assessment Plan 2005

REFERENCES:

- DB-OP-00000, "Conduct of Operations"
- DB-OP-00004, "Operator Aids Control"
- DB-OP-00005, "Operators Logs and Rounds"
- DB-OP-00006, "Night Orders and Standing Order Log"
- DB-OP-00016, "Temporary Configuration Control"
- DB-OP-00018, "Inoperable Equipment Tracking Log"
- DB-OP-00100, "Shift Turnover"
- DB-OP-00200, "Shift Engineer"
- DB-OP-01002, "Component Operation and Verification"
- DB-OP-01003, "Operation's Procedure Use Instructions"
- DB-OP-01200, "Reactor Coolant Leakage Management"
- DB-DP-00007, "Control of Work"
- NG-DB-00018, "Operability Determinations"
- NOP-WM-2001, "Work Management Process"
- NOP-LP-2001, "Condition Report Process"
- NOP-OP-1002, "Conduct of Operations"
- GP-03, "Conduct of Pre-job Briefs and Post-job Reviews"
- Work Process Guideline (WPG) – 2, "Operation's Equipment Issues"
- NRC Inspection Procedure (IP) 71715, "Sustained Control Room and Plant Observation"
- NRC IP 71707, "Plant Operations"
- NRC IP 93802, "Operational Safety Team Inspection (OSTI)"
- NRC IP 93806, "Operations Readiness Assessment Team Inspections"
- An index of Condition Reports, sorted for Operations Department involvement, July 1, 2004 through June 1, 2005;
- The "Work Week Schedule" for the on-site assessment weeks
- The licensed operator training schedule for the on-site assessment weeks
- Last three Quality Assurance quarterly assessments
- Applicable recent internal Operations self-assessments
- Applicable Company Nuclear Review Board minutes from last three CNRB intervals

Operation's Performance Assessment Plan 2005

ASSESSMENT PLAN APPROVALS:

Prepared by: Larry E. Briggs Date: 3/10/05
Larry E. Briggs, Assessment Team Lead

Approved by: Lori J. Strauss Date: 3/15/05
Lori J. Strauss, Project Manager

Approved by: Jeannie M. Rinckel Date: 3/15/05
Jeannie M. Rinckel, 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

- 2004 - *Silver Fox Synergies, LLC*; Team Lead, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order. A similar Operations performance assessment was conducted at the Perry Nuclear Power Plant.
- 2001 - *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 I 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

- 2004 - *Silver Fox Synergies, LLC*; Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order. A similar Operations performance assessment was conducted at the Perry Nuclear Power Plant.
- 2004 - *Performance, Safety & Health Associates, Inc.*; Independent Consultant – Assisted in the conduct of Licensed Operator audit examinations at the St. Lucie Nuclear Power Plant.
- 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.

Industry Peer Reviewer
Tracy Rhodes
Operations Work Process Manager
McGuire Nuclear Station (MNS)

- 2002 - present: *MNS Units 1&2 (Westinghouse)*; Nuclear Operations Work Process Manager. Provides planning, direction and supervision of Units 1 and 2 on-line operational activities, including work release and safety tagging. Manages on-line activities to ensure compliance with probabilistic risk assessment and technical specifications.
- 1998-2002: *MNS Units 1&2 (Westinghouse)*; Nuclear Operations Shift Manager. Managed the daily Operational activities of two 1200 MWE nuclear generating units. Evaluated and resolved operating problems to ensure the safe and reliable operation of the units within the limits of technical specifications and corporate policies. Responsible for ensuring that the units operated within the procedural and regulatory guidelines. Ensured proper training and qualification of operating crews to perform their assigned duties.
- 1996-1998: *MNS Units 1&2 (Westinghouse)*; *Nuclear Assistant Shift Operations Manager*. Assisted the Shift Operations Manager in the staffing of the operating shifts. This included scheduling of the on-line and off-line resources, interviewing and hiring of new employees for the Operations group, and supervising the basic operator training classes.
- 1986-1996: *MNS Units 1&2 (Westinghouse)*; Nuclear Shift Supervisor. Supervised licensed and non-licensed operators; directed the performance of plant operations in the control room, including directing the control room crews through abnormal and emergency procedures; as well as all other plant operations.
- 1981-1986: *MNS Units 1&2 (Westinghouse)*; Nuclear Reactor Operator. Performed reactivity changes, including the initial startup and testing of McGuire Units 1 and 2.
- 1975-1981: *MNS Units 1&2 (Westinghouse)*; Non-licensed Nuclear Operator. Operated plant equipment, including much of the initial testing of plant system and components. Prepared and placed safety tags for personnel and equipment protection.

Industry Peer Reviewer

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

- 2003-present: *ANO-Unit 1 (B&W)*; Operations Manager - Provides planning, direction and overall supervision of Unit One Operations Department.
- 2002-2003: *ANO-Unit 2 (CE plant)*; Instrumentation and Control 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. Led 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 Steam Generator replacement outage. Assistant Operations Manager-assist the Operations Manager in planning, direction, control and overall supervision of the operations department.
- 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 and 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 and 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.