

9 Twin Orchard Drive
Oswego, NY 13126
August 14, 2005

James L. Caldwell
Regional Administrator
USNRC Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Dear Mr. James L. Caldwell:

I have read a letter dated August 8, 2005 providing the FENOC response to IR 05000440/2005003. I have some comments.

I guess the first comment would have to be that the Perry Performance Improvement Initiative was not fully a success if it needs a (previously unannounced) Phase 2.

My next comment is a prediction that Phase 2 will not be successful (and that a Phase 3 will be offered). I feel Phase 2 is aimed at the wrong root cause. They seem to think that their programs are in need of improvement. Actually, I don't think their programs matter much. Their need is for workers with technical knowledge and judgment that are both empowered to work properly in their assigned functional area and held accountable if they don't.

Presently, I don't see this happening. In fact, how could anybody conclude Perry workers are being held accountable if they can make the same mistake about 100 times in 6 years just installing fasteners?

Here is what I think needs to be done. First, get somebody that can run a BWR to specify the jobs that need to be done and the necessary skill levels of the people assigned to each job. (Perhaps Entergy/FitzPatrick would be a choice based on their recent handling of a primary containment breach). Next, check each site assigned person against the specified job requirements.

Note that this can be done at zero percent power. And, it could be done under a 0350 committee. In fact, I request that it be done at zero power under a 0350 committee.

This is Letter 3. I need no reply.

Thank you,



Tom Gurdziel

Copy: D. Lochbaum

AUG 19 2005



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