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Vice President - Nuclear

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Docket Number 50-346
License Number NPF-3
Serial Number 1-1432

August 29, 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 Engineering Program Effectiveness Independent Assessment Plan
for the Davis-Besse Nuclear Power Station - Year 2005

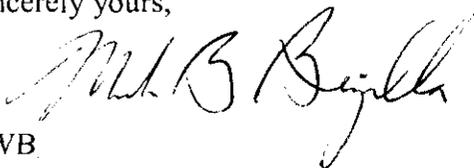
Dear Mr. Caldwell:

The purpose of this letter is to submit the assessment plan and related information for the 2005 independent external assessment of the Davis-Besse Nuclear Power Station (DBNPS) Engineering program effectiveness. 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," (DBNPS letter 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 Engineering Program Effectiveness Independent Assessment Plan, including the identification and qualifications of the assessors. The onsite portion of the assessment is scheduled to commence on November 28, 2005, with this 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. The final assessment report and action plans, if required, will be submitted to the NRC within 45 days following 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,



AWB

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Attachment 1 - Commitment List
Attachment 2 - Davis-Besse Nuclear Power Station Engineering Program Effectiveness
Independent Assessment Plan
Attachment 3 - Davis-Besse Nuclear Power Station Engineering Program Effectiveness
Independent Assessment Assessors and Qualifications

cc: USNRC Document Control Desk
DB-1 NRC/NRR Project Manager
DB-1 Senior Resident Inspector
Utility Radiological Safety Board

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Attachment 1
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COMMITMENT LIST

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company's (FENOC) 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 (419-321-8585) at the DBNPS of any questions regarding this document or associated regulatory commitments.

COMMITMENTS

DUE DATE

None. Serial Number 1-1432 contains no new commitments.

N/A

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Attachment 2

Davis-Besse Nuclear Power Station
Engineering Program Effectiveness Independent
Assessment Plan

(6 pages to follow)

FENOC Davis-Besse Engineering Assessment Plan – 2005

NUMBER:

COIA-ENG-2005

ASSESSMENT AREAS:

Engineering program effectiveness of modifications, calculations, system engineering, and corrective action program utilization.

PURPOSE:

The purpose is to provide an independent and comprehensive assessment of the Engineering program effectiveness 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. The assessment will also be used to assess the rigor, criticality, and overall quality of available Davis-Besse internal self-assessment activities in the Engineering program areas listed above. The final assessment report will provide an overall concluding statement on the Engineering program effectiveness as rated utilizing the assessment categories of DBBP-VP-0009.

SCOPE:

The Independent Assessment Team will assess the following Engineering program areas:

1. Plant Modification process
2. Calculation process
3. System Engineering
4. Implementation of the Corrective Action Program by Engineering
5. Effectiveness of assessment activities
6. Corrective actions taken in response to the Areas for Improvement (AFI) identified during the 2004 Independent Assessment of the Davis-Besse Engineering Program Effectiveness

The Assessment Team will assess conduct of the following activities:

FENOC Davis-Besse Engineering Assessment Plan – 2005

1. Plant Modification Process

The team will perform a review of activities to assess the effectiveness of the plant modification process:

- a. Selection and prioritization of potential modifications (2004 AFI DB 1.2), including assessment of delayed modifications on plant and operating personnel
- b. Owner acceptance sub-process (review of contracted work)
- c. Quality of modification packages since the 2004 assessment
- d. Closeout of modification packages and supporting document updates (2004 AFI DB 1.2)
- e. Effectiveness of modifications
- f. Interaction and support from parallel processes
- g. Workload management

2. Calculation Process

The team will assess the following attributes of the plant calculation process:

- a. Workload management, including appropriateness of work priorities
- b. Acceptance criteria
- c. Margin management and allocation, propagation of engineering requirements for operation and maintenance
- d. Linkages and consistency with other calculations
- e. Preservation of design bases
- f. Documentation/traceability/attribution
- g. Calculation health and improvement program (2004 AFI DB 2.2)
- h. Interaction and support from parallel processes
- i. System descriptions design information
- j. Engineering rigor and attention to detail
- k. Fleet counterpart interactions

3. System Engineering

The team will assess the following items:

- a. System Engineering alignment and plant support
- b. System Health evaluation and reporting
- c. Process for prioritizing, communicating, and resolving system health deficiencies and program deficiencies
- d. Equipment Reliability Improvement Program
- e. Maintenance Rule system monitoring and trending
- f. Experience and expertise, including use of operating experience
- g. Margin awareness and margin allocation
- h. Interaction and support from parallel processes
- i. Access to knowledge of Engineering information in calculations
- j. Workload management

FENOC Davis-Besse Engineering Assessment Plan – 2005

4. Implementation of the Corrective Action Program by Engineering

The Assessment Team will assess the following:

- a. Promptness in initiating condition reports for identified conditions adverse to quality
- b. Condition Report ownership and appropriate initiator involvement
- c. Quality of root and apparent causes produced by Engineering and associated management behavior and guidance
- d. Prompt acceptance of corrective actions
- e. Corrective action quality and implementation timeliness
- f. Effectiveness of corrective actions to prevent recurrence
- g. Support of corrective actions assigned to others
- h. Workload management and backlog management
- i. Response to Davis-Besse CR 05-02585 which documents the findings from the NRC Safety System Design and Performance Capability (SSDPC) Inspection

5. Effectiveness of Assessment Activities

The Assessment Team will evaluate the effectiveness of the Davis-Besse Nuclear Power Station's assessment activities associated with the implementation of Engineering programs as follows:

- a. Review the results of the Davis-Besse Quarterly Quality Assessments that evaluated Engineering. 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 the offsite safety committee activities), and evaluations conducted of Engineering program implementation.
- c. Determine if the Engineering staff is aggressive in correcting self-assessment and assessment findings, and determine whether the corrective actions are adequate, timely, properly prioritized, and that effectiveness reviews are ensuring the desired results. (2004 AFI DB 6.2)
- d. Determine the receptivity and responsiveness of management and staff to issues raised in self-assessments and assessments.

6. Corrective actions taken in response to the Areas for Improvement identified during the 2004 Independent Assessment of the Davis-Besse Engineering Program Effectiveness

The Assessment Team will evaluate the responses to the three AFIs identified during the 2004 Independent Assessment within Areas 1 (Modification Process), 2 (Calculation Process), and 5 (Effectiveness of Self-Assessments) as noted above where an AFI is referenced.

FENOC Davis-Besse Engineering Assessment Plan – 2005

INDEPENDENT ASSESSMENT TEAM:

- John Garrity, Marathon Consulting Group, Team Leader
- Paul Borer, Marathon Consulting Group
- Philip DiBenedetto, Marathon Consulting Group

- Eugene Kelly, Manager - Engineering Programs, Limerick Generating Station, Exelon Nuclear
- John Meyer, Design Engineering Analysis Manager, Comanche Peak, TXU Energy
- Glenn Perkins, General Supervisor - Corporate Engineering - Fleet Programs, Constellation Energy Group

(Biographies attached)

SCHEDULE:

- October 27, 2005: Send selected documentation to team members to begin off-site preparations.
- October 31, 2005, to November 23, 2005: Offsite (in office) review in preparation for onsite assessment.
- November 27, 2005: Assessment team will assemble at the plant for final assessment preparations.
- November 28, 2005, to December 9, 2005: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- December 23, 2005: Draft team assessment report and final debrief (marks the completion of the assessment) will be provided to Davis-Besse.
- December 30, 2005: Final team assessment report provided to Davis-Besse.
- February 6, 2006: 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 DBBP-VP-0009, "Management Plan for Confirmatory Order Independent Assessments."

The assessment methodology may include, but is not limited to, any combination of the following:

- Observing activities
- Interviewing personnel
- Reviewing documentation
- Evaluating or performing trend analysis
- Reviewing procedures, instructions, and programs
- Comparing actual performance levels with pre-established performance indicators

FENOC Davis-Besse Engineering Assessment Plan – 2005

The following general standards will apply to the Assessment of Davis-Besse Engineering program implementation:

- Modifications and Calculations reflect in-depth reviews of problems and resolutions that support a high level of nuclear safety.
- Engineers demonstrate knowledge and understanding of the design basis, including maintenance of design basis documentation.
- System engineers demonstrate intolerance for failures of critical equipment.
- Engineers maintain clear ownership of corrective actions from initiation through resolution.
- A rigorous approach to problem solving and application of engineering procedures and methods is used.

The assessment team will review the referenced procedure/documents during the preparation period prior to site arrival.

The Assessment Team will identify in its final report, as applicable, areas of strength, areas in need of attention, and areas for improvement as defined in Davis-Besse Business Practice DBBP-VP-0009. The Team will provide an overall concluding statement on the Engineering program effectiveness as rated utilizing the assessment categories of DBBP-VP-0009.

REFERENCES:

- Confirmatory Order dated March 8, 2004
- DBBP-VP-0009, "Management Plan for Confirmatory Order Independent Assessments"
- NOP-CC-2003, "Engineering Changes"
- NOP-CC-3002, "Calculations"
- NOP-LP-2001, "Condition Report Process"
- Responses to 2004 Engineering Program Effectiveness Independent Assessment Areas for Improvement
- Action items from NRC inspection reports issued since October 22, 2004, that are applicable to the areas assessed (i.e., condition reports, corrective actions, responses to findings and non-cited violations)
- Applicable self-assessments performed since October 22, 2004
- QA quarterly assessments for past three quarters
- CNRB meeting minutes from last three CNRB intervals
- Applicable Section or area Performance Indicators

FENOC Davis-Besse Engineering Assessment Plan – 2005

ASSESSMENT PLAN APPROVALS:

Prepared by: John H. Garrity Date: 8/29/05
John H. Garrity, Assessment Team Lead

Approved by: Lori J. Strauss Date: 8/29/05
Lori J. Strauss, Project Manager

Approved by: Jeannie M. Rinckel Date: 8/29/05
Jeannie M. Rinckel, Executive Sponsor

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Attachment 3

Davis-Besse Nuclear Power Station
Engineering Program Effectiveness Independent
Assessment

Assessors and Qualifications

(11 pages to follow)

John H. Garrity
President and Chief Executive Officer (CEO)
Marathon Consulting Group

- 1994-present: *Marathon Consulting Group*; President and CEO - Responsible for Marathon client service operations, and selected personal consulting engagements. Engaged in expert consulting in the area of process performance monitoring and improvement, management mentoring, process centered team formation and compensation, configuration management, business plan and corporate strategy development, process improvement training, and project management training. Also conducted root cause and collective significance analyses of client situations, and participated or lead high impact teams to resolve problems.
- 1993-1994: *New York Power Authority*; Resident Manager - Placed in charge after unit was shut down under NRC confirmatory action letter and on problem plant list. Responsible for developing and executing plan to resolve problems in context of intense political pressure and company senior management turnover. Numerous escalated enforcement actions from actions of earlier periods mitigated by effective, aggressive management investigations and corrective actions.
- 1992: *TVA Bellefonte*; Site Vice President - Responsible for all ongoing activities necessary to reactivate the project from deferred status.
- 1990-1992: *TVA, Watts Bar*; Site Vice President - Responsible for all activities necessary to progress completion of the Watt's Bar units, including engineering, construction, startup, operational readiness, and commissioning. Formulated management objectives for restart of construction following stand down and significant regulatory involvement. Reengineering of design engineering and construction processes, restart of construction, outsourcing construction labor, engineering, and management. Instituted management performance accountability through site wide self-monitoring program, based on principles of TQM. Significant improvement of site nuclear performance, left site positioned for successful completion. Credibility with NRC restored. Significant process performance improvement results in engineering design, engineering analysis, construction engineering, construction, and corrective action.
- 1990: *Maine Yankee Atomic Power Co*; Assistant to President - Special projects assignment, including work on low level waste disposal options available to company and state.
- 1989-1990: *Maine Yankee Atomic Power Co*; Vice President Engineering and Licensing - Responsible for nuclear engineering, plant engineering, licensing, and operations support.
- 1988-1989: *Maine Yankee Atomic Power Co*; Assistant Vice President Engineering and Quality Programs - Responsible for quality assurance, nuclear engineering, licensing and plant engineering.
- 1984-1988: *Maine Yankee Atomic Power Co*; Plant Manager/Senior Site Manager - Responsible for site operations.
- 1984: *Maine Yankee Atomic Power Co*; Assistant Refueling Manager - Special assignment, monitored several dozen engineering projects and coordinated activity with overall refueling effort.
- 1980-1984: *Maine Yankee Atomic Power Co*; Director, Nuclear Engineering and Licensing - Responsible for overall coordination of reload design, plant safety analysis and nuclear engineering analysis of plant systems, emergency planning, and radiological monitoring.

John H. Garrity (continued)

- 1975-1980: *Central Maine Power Co.*; Principal Nuclear Engineer for Central Maine Power Co. (1976 –1980), project engineer for two new reactor sites (1975)
- 1970-1974: *Maine Yankee Atomic Power Co.*; performed primary/reactor and secondary plant systems performance monitoring (1973-1974), Reactor Engineer & Startup Test Supervisor for commissioning of the Maine Yankee reactor (1970-1972)

Paul J. Borer
Consultant
Marathon Consulting Group

- 2002-present: *Marathon Consulting Group* - Performed Safety Culture and Engineering Effectiveness Assessments.
- 1986-2002: *Institute of Nuclear Power Operations (INPO)*-Held the following positions:
 - Senior Representative for Assistance - Management consulting role. Responsible for formulating performance improvement plans for several nuclear stations. Provided direct feedback to senior station management on performance issues. Prioritized deployment of INPO assistance resources.
 - Division Director, Plant Operations Division - a technical INPO division responsible for evaluation of Operations, Chemistry, and Radiation Protection areas. Involved in setting standards for evaluations, responsible for the evaluator training program, and assisting the industry in attaining standards of excellence.
 - Detroit Edison Vice President - Nuclear Generation (On - loan from INPO 1997-1998) Responsible for all aspects of Operation, Maintenance, and Engineering of a large scale BWR. Led a plant staff of approximately 500.
 - Vice President, Nuclear Engineering - New York Power Authority (On - loan from INPO 1993-1994). Responsible for Design Engineering at two nuclear generating stations. Developed and implemented a plan to deploy corporate design engineering resources to the stations in order to be more responsive to station needs.
 - Department Manager - Managed four INPO departments (Emergency Preparedness, Operating Experience Applications, Technical Support, and Operations) - Responsible for the evaluation of their respective areas of plant performance and various assistance programs. Also functioned as a Team Manager and lead teams of 15-20 INPO and industry professionals during performance-based nuclear plant and corporate evaluations.

Held a Senior Reactor Operator's License - Boiling Water Reactor and Licensed Professional Engineer - Mechanical.

- 1985: *Engineering, Planning, and Management, Inc.*; Project Manager - Responsible for the overall conduct of work, sales, budget, schedule, client relationship, and quality of products for EPM clients in the Southeastern U.S.
- 1983-1984: *Smith Barney, Harris Upham, and Company*; Account Executive - Responsible for retail securities sales, client development, securities research, financial planning advice.
- 1976-1983: *Cooper Nuclear Station*; Served in various management positions, all reporting to the site manager. (Operations Manager, Engineering Manager, Chemistry and Radiation Protection Manager)
- 1970-1976: *U. S. Navy*; Completed the Naval Nuclear Power Training Program and served aboard a nuclear submarine.

Philip A. DiBenedetto
Director, Marathon Consulting Group

- 2004-present: *Marathon Consulting Group, Inc., Director* - Responsible for business development and client service support. Assigned to First Energy Nuclear Operating Company (FENOC) Perry plant as Design Engineering Manager in October – December 2004. Responsibilities included implementation of performance improvement initiatives, closure of corrective actions, development of operability determinations, management direction to civil, structural, electrical, and I&C design engineering units as well as configuration management and design support units. Duties included the management of the preparation, presentation, and implementation of complex modifications and associated documentation such as Drawing Change Notifications, Engineering Change Notices, Engineering Change Request ECRs, and Engineering Change Packages.
- 2000-2003: *Constellation Nuclear Services (Cns), Inc.:*
 - *Executive Director* - Responsible for the development and management of all technical projects for CNS at Omaha Public Power District (OPPD) and Nebraska Public Power District (NPPD).
 - *Project Manager/OPPD* – Responsible for all aspects of the license renewal process and technical support during NRC review. Program Manager for the upgrade of safety-related Environmental Qualification (EQ) files for the extended period of operation (qualified life of 60 years).
 - *NPPD* - Participated in a multidiscipline review of the unit's EQ Program. Provided Technical Oversight during project improvement program. Performed third party testing of safety related electrical equipment, supported results at NRC regional enforcement meeting.
 - *OPPD Electrical and Mechanical Lead* – Supported License Renewal for electrical and mechanical systems, including the development of cable and penetration Aging Management Programs (AMP); development of Aging Effects Requiring Management (AERM) programs, AMP, and the development of aging management groups (AMG). Assisted and consulted with numerous utility clients regarding the License Renewal Program. Lead Electrical for the Beaver Valley (W- PWR) and Nine Mile Point (GE – BWR) License Renewal projects.
- 1999: *Tekton Resources, Vice President Nuclear Services* - Responsible for the management of the site technical resources within the Fluor Daniels Nuclear Services Division. Site assignments included engineering at commercial operating nuclear power plants, decommissioned commercial facilities, and cleanup, restoration, and decommissioning of government-owned weapons and fuel facilities.
- 1983-1999: *DiBenedetto & Associates, Inc.,*
1996-1999: Director of Analysis and Programs, Northeast Utilities, Nuclear Oversight (Consultant):
 - Contract with Northeast Utilities, Millstone Nuclear Power Plant. Managed Nuclear Oversight and Assessment for a three-unit nuclear plant, including a 1996 troubled plant oversight program implemented to insure all commitments and programs were ready to restart. As Director of Oversight managed a technical staff of 80 engineers and scientists responsible for assessing the progress of the utility's engineering staff.
 - Contract with TVA to manage the Electrical Maintenance Group during the final stages of construction at Watts Bar for the review and acceptance of equipment and systems from the construction group for operations. Developed and implemented Operational Readiness Reviews and managed the response team for NRC audits and inspections of the Watts Bar Electrical EQ Program.

Philip A. DiBenedetto (continued)

1983-1999: *President and Chief Engineer:*

- Provided EQ consulting services to utilities, including utility-specific EQ training programs, preparation of technical reports and expert testimony for utility/NRC hearings and utility prudence hearings, utility representation at USNRC meetings, preparation of EQ Program descriptions and assistance in the implementation of EQ Programs. Directed and managed project team in areas of configuration management and commercial quality procurement. Participated as lead auditor for third party management and technical audits.
- Provided consulting services to Utility Group on Plant Life Extension (PLEX) and participated as EQ consultant to the lead PWR candidate for License Renewal. Developed a testing program to study the management of age-related degradation in systems, structures, and components in support of License Renewal.
- Provided engineering and program support to over thirty-five US utilities and twelve foreign utility and government agencies, including IAEA.
- 1981-1983: *Nutech Engineers, Director of Engineering* - Developed the EQ Group, providing services such as identification of required equipment, assessment of required profiles, development of central files, establishment of procedures for surveillance and maintenance and site verification. Additional services included independent EQ audits, training and seminars and system reviews to justify interim operation. Developed a Mechanical EQ Program, authored several technical documents relating to EQ and the impact of rulemaking thereon, and developed an EQ seminar which was presented in Belgium, Holland, Japan, Korea, Spain, Switzerland, Taiwan and the United Kingdom. Provided a broad range of engineering services to clients, including management overview audits, Quality Assurance reviews and engineering systems and supporting analyses.
- 1974-1981: *US Nuclear Regulatory Commission*
 - *Section Leader of Environmental Qualification (EQ)* - Managed EQ aspects of the technical regulation of commercial nuclear power plants.
 - *Senior Reactor Safety Engineer* - Member of a task group to perform systems evaluations at Three Mile Island in the cleanup and recovery phase. Member of a task group which developed the Systematic Evaluation Program (SEP), developed the SEP's (NRC) leak-before-break position for high energy lines, performed thermal hydraulic analyses associated with N-1 loop operation and performed failed fuel studies.
 - *Project Manager* - Managed the review and evaluation of a variety of engineering safety and environmental considerations associated with the design and operation of commercial nuclear power plants.
 - *Operating Reactor Project Manager* - Responsible for Regulatory Safety and Licensing Actions associated with the LaCrosse Boiling Water Reactor, Vermont Yankee and Beaver Valley Power Station Unit 1.
- 1973-1974: *General Electric Company, Knolls Atomic Power Laboratory, Primary System Engineer* - Finalized design concepts and prepared operating instructions and test procedures for nuclear powered submarine systems.

Eugene M. Kelly
Manager – Engineering Programs
Exelon Nuclear, Limerick Generating Station

- 2001-present: *Manager, Engineering Programs, Exelon Nuclear, Limerick Station* - Oversee 12 engineering programs including risk management, maintenance rule, fire protection, ISI and IST, reactor vessel internals, Flow Accelerating Corrosion (FAC) and heat exchangers, thermal performance, leak rate testing, and valve reliability (MOV, AOV, Check Valve, MSIV). Chairman of INPO Working Group on Engineering Programs Excellence. Project manager for two risk-informed industry pilot initiatives on PRA model quality and technical specification surveillance frequency extension.
- 1999–2001: *Manager, Electrical Plant Systems, Exelon Nuclear, Limerick Station* - Responsible for the performance of electrical systems including eight emergency diesel generators, 220 and 500 kV switchyards, a large DC battery distribution network, ventilation and fire protection, security systems and reactor protection instrumentation. Coordinated preventive maintenance, special testing, failure casual analysis, vendor interface and modification improvements. Instituted process improvements in engineering work management. Chairman of Maintenance Rule Expert Panel and member of Plant Operating Review Committee.
- 1994-1998: *Manager, Systems Engineering Branch, U.S. Nuclear Regulatory Commission (NRC), Division of Reactor Safety, King of Prussia, PA* - Responsible for assessment of engineering programs at 20 nuclear reactor sites throughout the Northeast. Manage engineering projects and specialist inspectors in areas including motor operated valves, service water, in-service testing, core physics and mechanical systems. Special projects include complex team inspections (e.g. SSFI), event follow up, design basis investigations and the Millstone Task Force. Agency spokesperson for inspection program. Developed risk-based approaches for inspection.
- 1991-1994: *Reactor Projects Chief, U.S. Nuclear Regulatory Commission* - Managed field offices and supervised resident inspectors at eight sites including Millstone, Haddam Neck, Rowe, Pilgrim and Vermont Yankee. Project management included coordination of Congressional correspondence, enforcement actions and performance assessment reports. Organized and participated in high visibility public meetings and briefings of elected officials and NRC executive management.
- 1988–1990: *Technical Support Staff Chief, U.S. Nuclear Regulatory Commission* - Developed nationwide Master Inspection Planning System and new core inspection program, including institution of budget analysis and new technical initiatives. Managed diagnostic teams, generic issue follow-up and integration of risk assessment techniques.
- 1985–1988: *Limerick Senior Resident Inspector, USNRC* - Supervised detailed inspections of design, test, maintenance, and event follow-up. Coordinated inspection oversight for startup and power ascension programs on one unit and completion of construction activities at the other. Primary author of Systematic Assessment Performance (SALP) Report for first commercial year of Limerick operation.
- 1982–1984: *Reactor Engineer, USNRC* - Conducted inspections of construction, pre-operational and startup testing at regional sites. Specialized training and qualification on General Electric, Westinghouse and Combustion Engineering plants. Special projects included engineering evaluations at all Yankee sites, and follow-up of employee concerns at Shoreham. Created unique “NTOL” assessment technique to support operating license decisions for five units.
- 1980–1982: *Systems Engineer, Catalytic, Inc., Philadelphia, PA* - Developed nuclear plant modifications for four clients including design specifications, detailed engineering and calculations, coordination of procurement, testing and field installation.

Eugene M. Kelly (continued)

- 1979–1980: *Nuclear Engineer, GPU Nuclear Corporation, Middletown, PA* - Responsible for radioisotope analysis, shielding calculations, Krypton venting evaluations and containment sump water sampling at Three Mile Island site following the accident.
- 1974–1979: *Safety Analysis Engineer, United Engineers and Constructors, Inc, Advanced Engineering Department, Philadelphia, PA* - Prepared Safety Analysis Reports for six nuclear projects. Performed thermal hydraulic studies, radiological dose and shielding calculations and system performance analyses. Developed a heat transfer model for an ultimate heat sink spray pond. Special assignments included startup test and licensing support.

John W. Meyer
Technical Support Manager
TXU Power – Comanche Peak

- 2004-present: *Comanche Peak Steam Electric Station (CPSES)*; Technical Support Manager- Responsible manager for department consisting of five units: 1) Engineering Programs is responsible for establishing and implementing such programs as Fire Protection Engineering, In-service Testing, In-service Inspection, ASME Repair and Replacement, welding processes and qualification, flow accelerated corrosion, RCS materials management, the electrical cable and raceway database, and Environmental Qualification of plant equipment. 2) Design Engineering Analysis has responsibilities delineated below. 3) The Joint Engineering Team serves as the Engineering rapid response team, addressing emergent issues and processing design changes to address documentation issues and minor modifications. 4) Procurement Engineering provides engineering support for procurement activities including development of technical and QA requirements, replacement item evaluations, spare parts management support, and management of TXU interests in the Pooled Inventory Management System. 5) The Computer Aided Design group provides drafting and designer support for the station.
- 2003-2004: *CPSES*; Design Engineering Analysis Manager - Responsibilities included maintenance of the CPSES design and licensing basis, design reviews, adverse condition report engineering resolution, industry operating event research and resolution, emergent operational problem resolution, consultation, engineering human performance, and the CPSES design control program. Provided analytical support for CPSES in such areas as radiation analysis, control room habitability, systems interaction, environmental barriers, thermal/hydraulic analysis, loss of ventilation analysis, tornado venting, electrical calculations, and civil/structural analysis.
- 1998-2003: *CPSES*; Engineering Analysis Manager - Responsible for analytical support of CPSES in such areas as radiation analysis, control room habitability, systems interaction, environmental barriers, thermal/hydraulic analysis, containment analysis, loss of ventilation analysis, and tornado venting. In addition, managed the efforts of the Risk and Reliability Supervisor, responsible for plant PRA and risk assessment activities.
- 1996-1998: *CPSES*; Design Basis Engineering Supervisor - Responsible for maintenance of the CPSES design and licensing basis, Master Equipment List maintenance, design reviews, adverse condition report engineering resolution, industry operating event research and resolution, emergent operational problem resolution, and implementation of reengineered electronic processes for design control and corrective action programs.
- 1992-1996: *CPSES*; NSSS and HVAC Systems Supervisor - Responsible for design engineering support on CPSES NSSS, HVAC, and Fire Protection Systems including design modification engineering, temporary modification engineering review, adverse condition report engineering resolution, industry operating event research and resolution, and emergent operational problem resolution.
- 1987-1992: *CPSES*; Principal Engineer - Staff Assistant to the Manager, Plant Engineering at CPSES. Founding member of Operations Support Engineering, formed to provide immediate design engineering support to CPSES Operations during transition from construction to Unit 1 operation. Prior to that an NSSS expert assigned to the Primary Plant Systems group of the on-site CPSES corporate engineering department.

John W. Meyer (continued)

- 1974-1987: *Westinghouse Electric Corp.*; As a Senior Project Engineer, served as Nuclear Systems Engineer in the CPSES site office. As a Senior Field Service Engineer, performed field services at operating and construction PWR projects. As an Engineer/Senior Engineer B, responsible for schedule control of a major subcontractor on the Clinch River Breeder Reactor Plant.
- 1969-1973: *U. S. Navy*; Completed Naval officer nuclear power training qualifying for supervision, operation, and maintenance of Naval Pressurized Water Reactors. Assigned to a Sturgeon Class Nuclear Attack Submarine.

Glenn R. Perkins
General Supervisor, Corporate Engineering – Fleet Programs
Constellation Energy Group (CEG)

- August 2005-present: *General Supervisor, Corporate Engineering- Fleet Programs, Constellation Energy Group (CEG)* - Responsible for developing Fleet Programs Excellence Guidelines for program quality and implementation. Developed standardized Program Health Reports and reporting criteria. Other areas of responsibility include development of standardized format for development of Aging Management Programs for License Renewal. Currently developing a Corporate Non-Destructive Examination (NDE) Organization to support CEG nuclear and fossil generating units. Coordinate and provide support to fleet assets in Materials Engineering, NDE and Engineering Programs technical and administrative issues.
- 2003- 2005: *General Supervisor Engineering Programs Group, Nine Mile Point, LLC* - Increased responsibilities to include all ASME Programs, Flow Accelerating Corrosion (FAC), Air-Operated Valves (AOV), Motor-Operated Valves (MOV), Check Valves, Relief Valves, Fire Protection, Maintenance Rule and EPIX Program owners.
- 1999- 2003: *Supervisor ASME Section XI Programs Group, Nine Mile Point Nuclear, LLC* - Oversee the development, maintenance and implementation of ASME Section XI Programs for Nine-Mile Point Units 1 & 2. Specifically, ensure that the ASME XI Programs are in compliance with code and regulatory requirements. Additional responsibilities included oversight of AOV, MOV and Check Valve Programs. Initiated and provided management oversight to many improvement initiatives in programs, such as: development of Containment Programs, use of Risk Informed Methodology for piping exams to reduce exam burden, use of BWRVIP 75 for exam reduction, and several other code improvements.
- 1998-1999: *Sargeant & Lundy, Consultant – In-service Inspection (ISI) Support, Niagara Mohawk - Nine Mile Point Unit 2* - Assigned as the interim Unit 2 ISI Program Manager for the Refueling Outage. Also performed independent assessment of Second Ten-Year Interval ISI & IWF Program Plans.
- 1997-1998: *Sargeant & Lundy, Supervisor - Inspection & Testing Group, Commonwealth Edison - Quad Cities Station* - Responsible for the implementation of all ASME Section XI Programs, including ISI Program, In-service Testing (IST) Program, Snubber Testing, Flow Accelerated Corrosion, RPV-IVVI, IWE Program Development, Pressure Testing Program and the Repair and Replacement Program.
- 1996-1997: *Sargeant & Lundy, Project Engineer, Commonwealth Edison - Quad Cities Station* - Consulting activities, including independent assessment of ISI programs, preparation of new ISI administrative procedures, rewrite of Repair & Replacement Program to include IWE requirements, completed design review for applicability of IWE/IWL requirements, general outage support including NIS-2 form completion, and 90-Day Summary Report preparation.

Glenn R. Perkins (continued)

- 1990-1996: *GRP Associates, Inc.*
 - Consultant services to *Niagara Mohawk Power Corporation* in ISI activities on Units 1 and 2, including compliance review and new 10-year program plan development and outage support.
 - 1991- 1992: *Yankee Atomic Electric Company, Yankee Rowe RPV Project Consultant, Florida Power and Light Company, St. Lucie Unit 2 and Turkey Point Units 3 and 4* - Program reviews for compliance and new 10-year program plan development to 1989 Edition of Section XI.
 - *Taiwan Power Company, Maanshan Units 1 and 2*: Program reviews for compliance and new 10-year program plan development to 1989 Edition of Section XI.
 - Principal investigator (NDE) on study for *Department of Energy* "State-Of-The-Art Report on Destructive and Nondestructive Evaluation Methodologies and Techniques for Steel Containments and Liners of Reinforced Concrete Containments in Nuclear Power Plants."
- 1981-1990: *NDE Engineering Consultants, Inc.*
 - 1989-1990: *Niagara Mohawk NMP Unit 2*: Redevelopment of Unit 2 first interval ISI program plan and 1990 outage coordinator for ISI activities.
 - 1988-1989: *Niagara Mohawk Unit 1*: Consultant to the ISI Task Manager; responsible for NDE contractor supervision, coordination of all ISI activities, programmatic and procedure review, and system turnover
 - 1985: *Florida Power and Light Company, Turkey Point Units 3 and 4*: Second 10-year interval ISI program development and NRC submittals.
 - 1982-1986: *Northeast Utilities Services Company, Millstone Unit 3*: PSI program development and implementation as on-site management.
 - 1981-1982: *Florida Power and Light Company, St. Lucie Unit 2*: PSI program development and implementation and on-site management support.
 - 1982: *Yankee Atomic Electric, Yankee Rowe*: Engineering support work during outage. Developed and presented ASME Section XI training program.
 - 1981-1982: Responsible for the development and implementation of ASME Section XI pre-service examinations of *Southern California Edison Company's SONGS Units 2 and 3 nuclear plants, and Arkansas Power and Light Company's Arkansas Nuclear One Unit 2*.

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