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August 21, 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 these comments after reading ADAMS document ML052210512.

The need for individuals to improve their skills and knowledge on their own initiative is not identified. (I feel this should be expected of engineers).

Attachment 1, Page 2 of 3, paragraph 1

I don't know what the "INPO Performance Model" is. Has any plant used it successfully?

Attachment 1, Page 2 of 3, paragraph 2

Making training programs "consistent with current fleet and industry practices" may not be sufficient for this plant.

Attachment 1, bottom of Page 2 of 3 and continuing to the next page

I find the "Employee Engagement and Job Satisfaction" section particularly interesting. Do you wonder, as I do, what the situation is there now if they want to get to an environment in which employees can work? Wouldn't you think the words should have been "must work"?

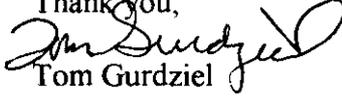
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Attachment 1, Page 3 of 3, paragraph 2

I am **TOTALLY OPPOSED** to the creation of employee panels to suggest actions to add to the Phase 2 Performance Improvement Initiative. I consider this idea a subtle (and effective) way to sabotage the whole plan (Phase 2 PII) because, as long as the plan can be added to, or changed, the *NRC inspectors can't inspect to it*. This way you get to claim that you have a plan without being accountable for it (while you run the plant at 100% power).

Note that it is my opinion that such disabling of the Improvement Plan has already occurred. My reference is page 20 of Perry Supplemental Inspection Report 2004008 (if my notebook is correct) where it says something like "at the time of the inspection, the inspectors were unable to review the Improvement Initiative Plan."

This is Letter 5. I need no reply.

Thank you,  
  
Tom Gurdziel

Copy: D. Lochbaum