

Richard Anderson  
Vice President-Nuclear440-280-5579  
Fax: 440-280-8029October 28, 2005  
PY-CEI/OIE-0657LMr. James L. Caldwell  
Regional Administrator, Region III  
United States Nuclear Regulatory Commission  
2443 Warrenville Road, Suite 210  
Lisle, Ill 60532-4352Perry Nuclear Power Plant  
Docket No. 50-440  
License No. NPF-58

Subject: Confirmatory Action Letter – Third Quarter 2005 Update Letter

Dear Mr. Caldwell,

This letter provides the FirstEnergy Nuclear Operating Company's (FENOC) response to the NRC Confirmatory Action Letter for Perry Nuclear Power Plant (PNPP) dated September 28, 2005. The letter confirmed those commitments provided in Attachment 3 of our letters dated August 8, 2005 and August 17, 2005. In your letter, you requested that we inform you in writing each quarter regarding any actions that we have completed.

As discussed at the October 12, 2005 public meeting, FENOC has completed five (5) discrete commitments that were scheduled for completion in third quarter 2005. The completed commitments are in the areas of IP 95002 Inspection Follow-up and Corrective Action Program Implementation Improvement. The attached table depicts those discrete commitment items completed to date.

We will continue to update you on our progress on a quarterly basis per your request. If you any have questions or require additional information, please contact Mr. Jeffrey Lausberg – Manager, Regulatory Compliance at (440) 280-5940.

Sincerely yours,



Attachment

cc: NRC Document Control Desk  
NRC Project Manager  
NRC Resident Inspector

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**PNPP Commitments**

Attachment  
PY-CEI/OIE-657L

ITEMS	DESCRIPTION	QUARTER DUE	STATUS
<b>1.0</b>	<b>IP 95002 Inspection Follow-up Issues</b>		
1.a	To date, one hundred eight (108) of the one hundred nineteen (119) procedures have been updated and issued. The remaining maintenance procedures have been updated and are currently going through the owner's review and acceptance review process.	Third 2005	Complete
1.b	CA 05-03655-01 is to revise Nuclear Quality Assurance Instruction NQI-1001, "QC Inspection Program Control," to specify a method by which classification can be established for additional inspection attention items that have experienced repeat failures. This method will include consideration of failure analysis, the risk-significance of the item, and the probability of failure occurrence in determining the extent of inspection activity.	Third 2005	Complete
1.c	CA 05-03655-03 is to revise Generic Mechanical Instructions (GMI)-0039, "Disassembly/Re-assembly of Divisions I and II Emergency Service Water Pumps," and GMI-040, "Disassembly/Re-assembly of Division III Emergency Service Water Pump," to include QC inspection points for work activities associated with pump shaft couplings, as specified by QC.	Third 2005	Complete
<b>2.0</b>	<b>Corrective Action Program Implementation Improvement</b>		
2.a	Develop expectations necessary for successful implementation of the corrective action program (CAP). Train the site to the expectations and accountability methods that will be used to improve implementation of the CAP.	Fourth 2005	Ongoing
2.b	Implement management controls to improve line ownership and accountability at the individual level for successful implementation of the CAP.	Third 2005	Complete
2.c	Establish a management review process that routinely monitors the site's and section level CAP performance. Take action to improve performance when expectations are not met and hold the organization accountable for overall CAP effectiveness.	Third 2005	Complete
2.d	Perform a self-assessment that evaluates the overall health of the CAP, including an aggregate assessment of key performance indicator trends. Assess whether substantial progress has been made in CAP performance.	Fourth 2006	Ongoing
<b>3.0</b>	<b>Excellence in Human Performance</b>		
3.a	Roles and responsibilities of the Site Leadership Team in implementing the human performance program will be defined and communicated.	Fourth 2005	Ongoing
3.b	Approximately monthly Site Training Advisory Committee and department / section Training Review Committee meetings have been held and will continue to be conducted with a strong focus on human performance through fourth quarter 2005.	Fourth 2005	Ongoing
3.c	The purpose and key activities of the Human Performance Program will be communicated to Perry Nuclear Power Plant (PNPP) personnel.	Fourth 2005	Ongoing
3.d	Group-specific needs analyses will be performed by training committees to determine the scope and content of initial and continuing training needs on human performance fundamentals and error prevention tools and training will be provided.	First 2006	Ongoing
<b>4.0</b>	<b>Emergency Preparedness</b>		
4.a	FENOC is expanding the population of qualified EP responders by approximately 125 persons to increase the depth of the emergency response organization.	Fourth 2005	Ongoing
4.b	Additional drills will be conducted to demonstrate appropriate Emergency Response Organization response times.	Fourth 2005	Ongoing