FENOC
FirstEnergy Nuclear Operating Company

5501 North State Route 2
Oak Harbor, Ohio 43449

Mark B. Bezilla
Vice President - Nuclear

419-321-7676
Fax: 419-321-7582

Docket Number 50-346
License Number NPF-3
Serial Number 1-1444

November 4, 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 Revision 1 - Organizational Safety Culture and Safety Conscious Work Environment Independent Assessment Plan for the Davis-Besse Nuclear Power Station - Year 2005

Dear Mr. Caldwell:

The purpose of this letter is to submit Revision 1 to the assessment plan and related information for the 2005 independent external assessment of the Davis-Besse Nuclear Power Station (DBNPS) Organizational Safety Culture, including Safety Conscious Work Environment (SC/SCWE). The original 2005 Organizational Safety Culture Independent Assessment Plan was submitted on August 3, 2005, via DBNPS letter Serial Number 1-1428.

In accordance with 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 Number 1-4524) the FirstEnergy Nuclear Operating Company (FENOC) is submitting Revision 1 to the Organizational Safety Culture Assessment Plan, including the identification and qualifications of the assessors. This Organizational Safety Culture Independent Assessment Plan, Revision 1 is being submitted due to the need to replace one of the assessors who became unavailable due to a medical issue. The need to replace the assessor was discussed with Ms. Christine Lipa, NRC Region III Branch Chief for the DBNPS, on October 28, 2005. Additionally, due to a schedule conflict, a minor schedule change has been made to the date of the assessment final debrief.

The onsite portion of the assessment remains scheduled to commence on November 7, 2005, with this portion of the assessment lasting approximately two weeks. The date of the final debrief with the DBNPS staff marking the end of the assessment has been rescheduled to occur two (2) days earlier than previously scheduled, and the two (2) subsequent activities have also been rescheduled accordingly. The final assessment

report and action plans, if required, will be submitted to the NRC within 45 days following the final debrief. The revised schedule is further detailed in the attached Assessment Plan.

The changes to the Organizational Safety Culture Independent Assessment Plan (Attachment 2) and to the assessors' biographies (Attachment 3) are identified with a revision bar in the right hand margin. This revision of the Organizational Safety Culture Independent Assessment Plan and the attached biographies supercedes the original submittal in its entirety.

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

Sincerely yours,

Steven A Loehlein
for MARK BEZILLA

JCS

Attachment 1 - Commitment List
Attachment 2 - Davis-Besse Nuclear Power Station Organizational Safety Culture Independent Assessment Plan, Revision 1
Attachment 3 - Davis-Besse Nuclear Power Station Organizational Safety Culture Independent Assessment Assessors and Qualifications, Revision 1

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

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 1-1444 contains no new commitments.	N/A

Docket Number 50-346
License Number NPF-3
Serial Number 1-1444
Attachment 2

Davis-Besse Nuclear Power Station
Organizational Safety Culture
Independent Assessment Plan
Revision 1

(6 pages to follow)

NUMBER:
COIA-SC-2005

ASSESSMENT AREA:

Organizational Safety Culture including Safety Conscious Work Environment

PURPOSE:

The purpose is to provide an independent and comprehensive assessment of the status of the existing Organizational Safety Culture, including the Safety Conscious Work Environment (SCWE), 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 review the areas for improvement that were identified in the 2004 Independent Assessment and it will also be used to assess the rigor, criticality, and overall quality of Davis-Besse internal self-assessment activities in this performance area.

The final assessment report will provide an overall concluding statement of the effectiveness of the Organizational Safety Culture using the rating categories of DBBP-VP-0009.

SCOPE:

The Independent Assessment Team will evaluate the following areas associated with Organizational Safety Culture, including SCWE, as conducted in the Independent Safety Culture Evaluations of the Davis-Besse Nuclear Power Station in February 2003 and November 2004:

1. Safety is a clearly recognized value in the organization.

- Documentation that describes the importance and role of safety in the operation of the organization exists.
- The value of safety is clearly transmitted and understood by all personnel through multiple mechanisms.
- Decision-making that reflects the value and priority of safety in a timely and focused manner exists.
- The necessary allocation of resources including time, equipment, personnel and money, is being made.

2. ***Accountability for safety in the organization is clear.***

- Roles and responsibilities are clearly defined and understood.
- Compliance with regulations and procedures exists.
- An independent and constructive relationship with the regulatory body exists.
- Delegation of responsibility with appropriate authority exists.
- Management commitment to safety is evident at all levels.

3. ***Safety is integrated into all activities in the organization.***

- Good housekeeping, material condition and working conditions exist.
- The quality of documentation and processes from planning to implementation and review is good.
- Sets of performance indicators are tracked, trended and evaluated.
- Use of self-assessment is evident.
- Integration of all types of safety is evident in the organization.
- Knowledge and thorough understanding of work processes exists.
- Collaboration and teamwork is encouraged, supported and recognized.

4. ***A safety leadership process exists in the organization.***

- Visibility and involvement of management in safety-related activities is evident.
- The involvement and motivation of all staff in the organization is evident.
- A change management process that promotes orderly transition is evident.
- An organizational process for conflict resolution exists and is effectively used.
- The impact informal leaders have on safety culture is recognized.

5. ***Safety culture is learning driven in the organization.***

- An open reporting culture without blame exists.
- Use of organizational and operating experience, both internal and external to organization, is evident.
- A process to identify problems, develop and implement an integrated corrective action plan, exists.
- Continuous development of staff, both professionally and technically, is evident.
- A questioning attitude is evident at all organizational levels.

6. ***A process for establishing a strong SCWE is in place and is demonstrated to be effective.***

- Employees and long term contractors, at all levels in the organization, understand and perceive the SCWE Program to be effective.
- Responsibility for raising concerns is not avoided because of fear of retaliation.
- The SCWE Program is clearly supported by management.
- An effective process is available for employees and long-term contractors to raise their concerns.

The results of the 2004 Independent Assessment of the Davis-Besse Organizational Safety Culture, including Safety Conscious Work Environment, identified several areas for improvement associated with each of these characteristics. The status of these areas will be reviewed as part of the 2005 Independent Assessment.

In addition to evaluating each of the 6 characteristics and progress in the areas for improvement, the internal continuous monitoring and evaluation of Safety Culture and Safety Conscious Work Environment programs and processes by the Davis-Besse Nuclear Power Station will be assessed. Focus will be placed on the comprehensiveness of Davis-Besse's internal monitoring programs in terms of addressing each of the identified Safety Culture and Safety Conscious Work Environment characteristics as well as the aggressiveness of Davis-Besse in correcting self-assessment findings associated with internal monitoring as well as any other assessment findings with implications for Safety Culture and Safety Conscious Work Environment.

INDEPENDENT ASSESSMENT TEAM:

- Dr. Sonja B. Haber, Human Performance Analysis, Corp., Team Leader
- Dr. Deborah A. Shurberg, Human Performance Analysis, Corp.
- Mr. Michael E. Stein, Vice President, Sonalysts, Inc.
- Mr. Aldo Capristo, Point Beach Regulatory Affairs Manager, Nuclear Management Company

Biographies attached.

SCHEDULE:

- July 5 through August 3, 2005: Develop, review and submit assessment plan to NRC.
- September 6, 2005: Identify and send selected documentation to team members to begin off-site preparations.
- November 1 through 3, 2005: Two members of the assessment team will be on-site to administer the Organizational Safety Culture Survey.
- November 6, 2005: Assessment team will assemble at the plant for final preparations.
- November 7 through 18, 2005: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- December 14, 2005: Draft team assessment report, including a final debriefing (marks completion of the assessment), will be provided to Davis-Besse within 30 days after the completion of the on-site portion of the assessment.
- December 21, 2005: Final assessment report provided to Davis-Besse.
- January 27, 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:

1. Functional Analysis

The Assessment Team will perform a review of relevant site documentation for the purpose of identifying positions to be interviewed (approximately 10 percent of the employee and long-term contractor population) and observations to be conducted, as well as to assist in defining the issues to be assessed in greater detail during the on-site portion of the assessment. Because independent Safety Culture Assessments were conducted during February 2003 and November 2004, materials requested will be focused on those developed since those assessments. Materials to be requested include:

a. Organizational charts;
b. Identification of important administrative procedures (table of contents);
c. Site performance data related to safety;
d. Past evaluations, including self-assessments, conducted by the site related to safety culture and SCWE, in particular with respect to the areas identified for improvement;
e. External assessments conducted for safety performance (e.g., inspections, audits);
f. Charters for steering committees and performance improvement initiatives, especially related to safety;
g. Copies of safety policies and programs, including safety culture and SCWE; and
h. Other information that the site may deem useful and relevant for the evaluation.

2. Structured Interviews and Behavioral Anchored Rating Scales

Structured interviews will be conducted with individuals whose positions were identified from the functional analysis. This will include individuals from all organizational levels at the site and corporate offices. The interviews will last no more than one hour and an estimated 10 percent of the employee and long-term contractor population will be selected to participate. Individuals will be requested to provide their input on the topics being assessed in the evaluation. At the conclusion of the interview, each interviewee will be requested to complete Behavioral Anchored Rating Scales (BARS). BARS are quantitative scales which allow information about some of the same issues discussed during the interview to be collected in another manner. No more than 4 rating scales are administered to any interviewee and the time to complete these scales is included as part of the interview.

3. Behavioral Checklists

The assessment team will utilize behavioral checklists in the observation of site activities. The behavioral checklists will allow a quantitative assessment of the behaviors observed in the course of the observations. Activities to be observed include:

a. Scheduled meetings;
b. Routine activities such as shift changes;
c. Work planning sessions (both scheduled and unscheduled); and
d. Work processes, such as maintenance activities, when applicable.

4. Organizational Safety Culture Survey

The organizational safety culture survey is a paper and pencil survey that will be administered to all employees and long-term contractors at the site. Questions concerning issues in the work environment related to management expectations, communication, coordination of work, work group cohesiveness, commitment, job satisfaction, attention to safety, and SCWE issues are included. The surveys will be administered to large group sessions and 100 percent of the employee and long-term contractor populations will be invited to participate. Results from the survey will be looked at in terms of the overall organization, as well as by groups within the organization (e.g., operations, engineering, maintenance, radiation protection, and chemistry).

5. Data Analysis

Information collected through use of the various assessment tools will be analyzed for strengths, observations and areas for improvements in the existing site Organizational Safety Culture and SCWE. The collected data will be used to assess the absence or presence of six safety culture and SCWE characteristics:

1) Safety is a clearly recognized value in the organization;
2) Accountability for safety in the organization is clear;
3) Safety is integrated into all activities in the organization;
4) A safety leadership process exists in the organization;
5) Safety culture is learning driven in the organization; and
6) A process to establish a strong SCWE is in place and is demonstrated to be effective.

In addition to drawing conclusions related to these characteristics, the data from this assessment will be compared to the data collected from similar independent assessments conducted in February 2003 and November 2004 and conclusions will be drawn regarding the trends noted between those assessments and this assessment.

Conclusions will also be made regarding the effectiveness of Davis-Besse corrective actions in the areas for improvement identified in the November 2004 Independent Assessment and in addressing findings from self-assessment efforts in this area. The aggressiveness of the facility in addressing findings from both self-assessments and independent assessments conducted with implications for Safety Culture and Safety Conscious Work Environment will be evaluated.

The assessment team will identify, as applicable, areas of strength, areas in need of attention, and areas for improvements as defined in Davis-Besse Business Practice DBBP-VP-0009, "Management Plan for Confirmatory Order Independent Assessments." The team will provide an overall concluding statement on the effectiveness of Davis-Besse organizational safety culture, including safety conscious work environment, using the rating categories of DBBP-VP-0009.

REFERENCES:

Independent Assessment of the Davis-Besse Organizational Safety Culture (Including Safety Conscious Work Environment), Human Performance Analysis, Corp. December 21, 2004
NRC Special Inspection – Management and Human Performance Corrective Action Effectiveness – Report No. 50-346/2003012 (DRP)
Safety Culture Evaluation of Davis-Besse Nuclear Power Station, Performance, Safety, and Health Associates, Inc. April 14, 2003
International Atomic Energy Agency, INSAG – 15, Key Practical Issues in Strengthening Safety Culture, Vienna, 2002.
Haber, S. B. and Barriere, M.T. "Development of a regulatory organizational and management review method" Research Report RSP-0060, Canadian Nuclear Safety Commission, Ottawa, Canada
NOBP-LP-2501, Safety Culture Monitoring
NOBP-LP-2502, Safety Culture Assessment
Quarterly Safety Conscious Work Environment Performance Indicators
Safety Conscious Work Environment Surveys
Cycle 14 Operational Improvement Plan

ASSESSMENT PLAN APPROVALS:

Prepared by: _____ Date: 11/02/05
Sonja B. Haber, Assessment Team Lead

Approved by: _____ Date: 11/2/05
Lori J. Strauss, Project Manager

Approved by: _____ Date: 11/4/05
Jeannie M. Rinckel, Executive Sponsor

Docket Number 50-346
License Number NPF-3
Serial Number 1-1444
Attachment 3

Davis-Besse Nuclear Power Station
Organizational Safety Culture
Independent Assessment

Assessors and Qualifications
Revision 1

(4 pages to follow)

Sonja B. Haber, Ph.D.
President and Senior Consultant
Human Performance Analysis Corporation

- **1995-present: Human Performance Analysis Corporation; President and Senior Consultant** – Designed, developed and implemented methodology to evaluate organization and management influences on safety culture. Methodology has been implemented in 40 different organizations across various industries and in several countries around the world. Within the nuclear industry, most recent experience includes Team Lead on the Independent Safety Culture Assessment Teams at the Davis-Besse Nuclear Power Station conducted in February 2003 and November 2004; Conducted safety culture evaluations for FirstEnergy Nuclear Operating Company's Perry and Beaver Valley Nuclear Power Stations; Conducted safety culture evaluations for the Canadian Nuclear Safety Commission across all of their major licensees; Conducted safety culture evaluation for Bruce Power at their nuclear power station; Conducted safety culture evaluations at 5 Spanish nuclear power plants including most recently the Vandellos Nuclear Power Plant after their service water pipe break. Developed and implemented management and supervisory skills workshops and courses in communication and observational skills. Authored and presented papers in various professional journals and meetings on the topic of safety culture.
- **1998-present: International Atomic Energy Agency; Special Expert** - Participated in multiple international missions to evaluate and assist with safety culture at various types of nuclear facilities including most recently the Paks Power Plant in Hungary.
- **1998-present: Hofstra University; Adjunct Associate Professor, Department of Psychology** - Conducted graduate seminars for students in an Applied and Industrial Psychology Program.
- **1987-1998: Brookhaven National Laboratory - Department of Advanced Technology; Group Leader, Organizational Performance** - Managed 9 professionals and over $35 million in projects which investigated the role of human factors in various nuclear safety programs. Projects were primarily for the U.S. Nuclear Regulator Commission and the U.S. Department of Energy including work on the evaluation of organization and management on safety performance, including the response to accident/emergency situations, field work at U.S. commercial power plants and DOE facilities, and the development of programmatic aspects of training at nuclear plants with Soviet-Designed Reactors.
- **1982-1987: Brookhaven National Laboratory; Associate Scientist** - Involved in experimental design, execution, statistical analyses and evaluation of behavioral data. Promoted to Scientist in 1984. Direct supervision of technical engineers, chemists, and laboratory technicians in interdisciplinary projects.
- **1981-1982: National Institutes of Health; Grant and Contract Administrator** -Programmatic responsibilities included grant and contract administration, report reviews, research initiatives and involvement in the peer review process.
- **1976-1981: Brookhaven National Laboratory; Assistant Scientist** - Pursued behavioral research into the role of psychological traits as markers for the predisposition to the onset of certain types of disease.

Deborah A. Shurberg, Ph.D.
Researcher/Consultant
Human Performance Analysis Corporation

- **1998-present: Human Performance Analysis Corporation; Researcher/ Consultant** - Team member on the Independent Safety Culture Assessment Team and subsequent follow-up assessment at the Davis-Besse Nuclear Power Station. Assessments were conducted in February 2003 and November 2004, respectively and participation included conducting interviews, observing work processes, and analysis of data collected from these activities as well data from a standardized survey.

  Participated in multiple projects to evaluate the influence of safety culture and organization and management factors on the safety performance of normally operating nuclear facilities. Projects involved conducting structured interviews and observations of key managers and supervisors in a nuclear facilities and delivery and analysis of a standardized survey to facility employees. Subsequent analysis of data collected has been used in the initial development of performance indicators for safety culture and organizational effectiveness.

  Developed a training program, and assisted in its delivery, focused on the collection and analysis of data related to organizational and safety culture. Had primary responsibility for development of course material on basic communication and observational skills for the International Atomic Energy Agency.

- **1988-1998: Brookhaven National Laboratory; Assistant Scientist** - Visited Ukrainian and Russian nuclear power plants as a member of a Training Needs Analysis Team tasked to develop findings to focus training program development efforts. Lead technical expert in the development and delivery of a training program designed to improve management and supervisory skills of managers in the Former Soviet Union.

  Member of a project team tasked to administer and analyze a standardized survey on organizational and safety culture to over 12,000 employees at twelve Department of Energy facilities. Participated in a research project examining the impact of staffing levels on safety performance based on tabletop and walk down analyses of work activities and structured interviews across all organizational levels.

  Technical lead on a project evaluating the influence of safety culture and organization and management factors on the performance of organizations in emergency situations. Conducted structured observations of simulated emergencies and reviewed relevant literature. Developed a model of organizational functioning during emergency situations.

Michael E. Stein
Vice President
Sonalysts, Inc.

- **1984-present: Sonalysts, Inc.**; **Vice President and Principal Analyst:** Work experience with Sonalysts include:

  2004: Team member for the 2004 safety culture evaluations for First Energy Nuclear Operating Company's Perry and Beaver Valley Nuclear Power Stations.

  1995-present: International Atomic Energy Agency (IAEA) - Worked with the Agency's Department of Technical Cooperation and the Department of Safeguards. Visiting lecturer at IAEA conferences in Karlsruhe, Germany on "The Role of Management in the Training and Qualification of Nuclear Plant Operators," and in Helsinki, Finland on "The Role of the Regulatory Body in the Training and Licensing of Nuclear Plant Operators." Presented papers at IAEA conferences in Vienna, Austria on the development of training programs at Balakovo Nuclear Power Plant, and chaired conference sessions. Re-designed the Safeguards Department's Introductory Course on Agency Safeguards to address technological advances in safeguards systems and implementation of the Additional Protocol, INFCIRC/540.

  1993-present: U.S. Department of Energy (DOE); International Nuclear Safety Program - Advisor to management for improving personnel performance through implementing the systematic approach to training at the Balakovo Nuclear Power Plant in Russia. Assessed the effectiveness of existing practices for training and qualification and identified changes that would foster improved safety performance in accordance with Lisbon Initiative goals. Assisted Training Center personnel with all phases of the Systematic Approach to Training (SAT) process for programs of instruction for operations and maintenance personnel. Advised training center department heads on programmatic improvements to the development and administration of training, including implementation of a formal on-the-job training program. Provided a U.S. nuclear industry perspective on standards for training quality, operational safety, administrative controls, and use of procedures. Worked directly with personnel at sites in Countries of the former Soviet Union and Central and Eastern European Countries to transfer modern U.S. technology, practices, and standards in the areas of safety awareness, maintenance, and operations. Project leader for transferring training programs to Russian, Ukrainian, Bulgarian, and Armenian RBMK and VVER reactor sites.

  1987-1995: U.S. Nuclear Regulatory Commission (NRC); Operator Licensing Examiner - Certified by the NRC as an operator licensing examiner for Westinghouse pressurized water reactor facilities. Assisted NRC regional offices in administering initial examinations required in the process of licensing commercial nuclear power plant reactor and senior reactor operators. Assessed operator candidates' ability to apply symptom-based Emergency Operating Instructions in accordance with the Westinghouse Owners' Group guidelines, their knowledge of safe operating limits, and their ability to adhere to operational safety practices, policies, and procedures.

  1987-1992: U.S. Department of Energy; Savannah River Site (SRS); Savannah River Re-Start Project - DOE team member for assessing SRS control room operators' readiness for restart. Evaluated control room crew team skills, technical knowledge, ability to diagnose failures, and use of procedures. Assessed training and evaluation methodologies, then formulated an improved process that was implemented as the SRS Peer Evaluator Program.

Aldo Capristo
Regulatory Affairs Manager
Nuclear Management Company - Point Beach Nuclear Plant

- **2005-Present: Nuclear Management Company - Point Beach Nuclear Plant; Regulatory Affairs Manager** - Responsible for all interactions with U.S. Nuclear Regulatory Commission regarding the maintenance of the station operating license. This includes licensing action, daily compliance activities, inspection coordination, correspondence, public meeting preparation and presentations.
- **2001-2004: Nuclear Management Company; Director of Employee Concerns** - Responsible for overseeing the independent internal dispute resolution process at eight operational nuclear reactor sites located in four Midwestern states. Formed the Internal Resolution Processes and organized the fleet Employee Concerns Program. Standardized many aspects of operation including a toll free hotline, intranet website, fleet procedures, common advertising, communication protocol, training, budgeting, and a corporate reporting hierarchy including the selection and management of full time managers at each facility.
- **1999-2000: Nuclear Management Company; Nuclear Oversight Manager** - Redirected the focus of the oversight organization from a strict regulatory compliance auditing group with a new focus on organizational effectiveness. Integrated all of the sites (fleet program) to create a problem resolution method that helped the sites to use the right program to focus management attention on the problem and find effective solutions.
- **1998-1999: Wisconsin Electric Point Beach Nuclear Plant; Employee Concerns Program Manger** - Began a new Employee Concerns Program for the site including training, establishment of hotlines, posters, brochures, and briefings for all hands.
- **1997-1998; Maine Yankee Atomic Power Company; Employee Concerns Program Manager** - Accepted the responsibility for reinvigorating a Employee Concerns program at a decommissioning nuclear facility. This change management plan included awareness briefings and skills-based training sessions to assist managers and supervisors in their role as Safety Conscious Work Environment (SCWE) facilitators.
- **1996-1997: Maine Yankee Atomic Power Company; Radiation Protection Supervisor/Manager** - Responsible for daily operations Radiation Protection supervision and management at an operating nuclear reactor site.
- **1994-1996: Maine Yankee Atomic Power Company; Radioactive Waste Shipping Manager** - Responsible for a $1M shipping budget to remove all stored low-level waste at the facility. Coordinated all resources to conduct a Department Of Transportation (DOT) and NRC compliant shipping campaign after a 2-year hiatus of storage.
- **1990-1994: Long Island Lighting Company Shoreham Nuclear Plant; Radioactive Waste Disposal Coordinator** - Coordinated all radioactive material removal at a decommissioning facility. Waste shipments included partially spent nuclear fuel over a tri-modal transport path of land, sea and rail. Coordinated all emergency response activities with U.S. Coast Guard, NRC, DOT New York, New Jersey and Pennsylvania regulators.
- **1981-1990: United States Nuclear Navy; Engineering Laboratory Technician** - Various responsibilities included daily operational water chemistry and radiological controls. Served as a nuclear power school fundamentals instructor, earning the award of "Master Training Specialist."

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Davis-Besse Nuclear Power Station 5501 North State Route 2 Oak Harbor, Ohio 43449

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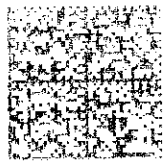

Mr. James Caldwell
Regional Administrator
U. S. NRC, Region III
2443 Warrenville Rd., Suite 210
Lisle, IL 60532-4352