

December 21, 2005

Mr. W. Pearce
Acting Vice President
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
10 Center Road, A290
Perry, OH 44081

SUBJECT: UPCOMING PERRY NUCLEAR POWER PLANT CONFIRMATORY ACTION
LETTER (CAL) FOLLOWUP INSPECTION - CORRECTIVE ACTION
PROGRAM (CAP) ACTION ITEM REVIEW

Dear Mr. Pearce:

On February 6, 2006, the NRC will begin a review of your actions to address issues related to your corrective action program as part of our September 28, 2005, Confirmatory Action Letter followup activities. In particular, this inspection will focus on determining whether your Commitments associated with the corrective action program that were identified in your August 17 and 25, 2005, letters which responded to our IP 95003 supplemental inspection report, as well as selected completed actions prescribed in the Perry Phase 1 and Phase 2 Detailed Action and Monitoring Plan (DAMP) to improve the corrective action program, were adequately implemented. A more detailed review of the overall effectiveness of the actions you implemented toward realizing improvements in the corrective action program will be conducted at a later date.

In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a request for documents needed for the inspection. The documents should be ready for NRC review by January 17, 2006.

If there are any questions about the material requested, or the inspection in general, please call Geoffrey Wright, who is the team leader for this inspection, at (630) 829-9602.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public

W. Pearce

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Sincerely,

/RA/

Eric R. Duncan, Chief
Branch 6
Division of Reactor Projects

Docket No. 50-440
License No. NPF-58

Enclosure: Request for Information Regarding CAL Followup Inspection
- Corrective Action Program Action Item Review

cc w/encl: G. Leidich, President - FENOC
J. Hagan, Chief Operating Officer, FENOC
D. Pace, Senior Vice President Engineering and Services, FENOC
Director, Site Operations
Director, Regulatory Affairs
M. Wayland, Director, Maintenance Department
Manager, Regulatory Compliance
T. Lentz, Director, Performance Improvement
J. Shaw, Director, Nuclear Engineering Department
D. Jenkins, Attorney, First Energy
Public Utilities Commission of Ohio
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

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Requested Information to Support

CAL Followup Inspection - Corrective Action Program Action Item Review

For the following Commitments and DAMP Action Items, please provide four (4) copies of a “closure package” that contains all necessary documentation to confirm that the subject items were completed. Documentation may include, but would not necessarily be limited to, condition reports, corrective action program closure documentation, original and revised procedures, training plan/syllabus and training attendance records, meeting schedules and minutes, FENOC newsletters, system walkdown schedules and documentation regarding walkdown observations, pre-job briefing records, and qualification records.

This documentation should be provided in a “stand-alone” format which allows each Commitment and/or Action Item to be reviewed individually.

If a Commitment or Action Item has not been completed, please indicate so in your response to this request and include a revised date when this item is expected to be accomplished.

This request is organized to be consistent with the eight action areas in PYBP-P11-002, “Performance Improvement Initiative Detailed Action and Monitoring Plan,” Revision 5, and the final revision of the Perry Phase 1 DAMP.

Action 1: Improve Ownership and Station Focus

- Commitment 2.a: “Develop expectations necessary for successful implementation of the corrective action program (CAP). Train the site to the expectations and the accountability methods that will be used to improve implementation of the CAP.”
- Commitment 2.b: “Implement management controls to improve line ownership and accountability at the individual level for successful implementation of the CAP.”
- DAMP Item I.1.1: “Train all managers and supervisors on the role of a corrective action program in a ‘learning organization’ and how it must be used to drive station performance improvement.”
- DAMP Item I.1.2: “Establish accountability for use of the corrective action program and implement management controls at the individual level and for all supervisors and above specific to successful implementation of the CAP. Improve implementation of FENOC fleet standard performance appraisal expectation.”
- DAMP Item I.1.5: “Establish a periodic meeting for all managers and supervisors to improve organizational alignment. Periodically brief issues with CAP and overall performance.”
- DAMP Item I.1.6: “Publicize CAP ‘success’ stories in the FENOC fleet newsletter.”
- DAMP Item I.1.8: “Develop and communicate a CAP P11 Communication Plan that outlines the initiative purpose, implementation plan, and success measures that demonstrate effective improvement in the corrective action program implementation.”

- DAMP Item I.1.9: “Perform an interim effectiveness review of the #1 action items in this table.”

Action 2: Focus on Improving the Station’s Ability to Self-Identify Problems Using the CAP

- DAMP Item I.2.1: “Train site personnel to the expectations and accountability methods that will be used to improve implementation of the CAP.”
- DAMP Item I.2.2: “Develop and distribute an expectations document to reinforce the requirements of NOP-LP-2001 and the behaviors necessary for successful implementation of the CAP...”
- DAMP Item I.2.3: “Implement a plan to routinely perform cross-functional walkdowns of risk-significant systems...”

Action 3: Focus on Prioritization of Problems Identified in the Corrective Action Program

- DAMP Item I.3.1: “Revise procedure NOP-LP-2001, “Corrective Action Program,” to provide guidance for initiation of a significant root cause evaluation at a lower threshold...”
- DAMP Item I.3.2: “Implement a two-step screening process in accordance with PYBP-SITE-0045, ‘Initial Screening Committee’...”
- DAMP Item I.3.3: “Adopt controls to assure proper thresholds are set for human and organizational performance issues...”
- DAMP Item I.3.4: “Determine the appropriate number and select appropriate individuals to obtain RCE and/or ACE qualification.”
- DAMP Item I.3.5: “Revise procedure NOBP-LP-2007, “Condition Report Process Effectiveness Review,” to include specific guidance for performing early effectiveness reviews...”

Action 4: Improve Quality of Evaluations and Corrective Actions

- DAMP Item I.4.2: “Strengthen the root cause investigators training plan and qualification requirements (JFG).”
- DAMP Item I.4.4: “Improve implementation of FENOC NOBP-LP-2007, ‘Condition Report Effectiveness Review,’ to improve challenging of the adequacy of actions taken...”
- DAMP Item I.4.5: “Manager pre-job brief all apparent cause evaluations and establish scope, expected resource investment, analytical techniques, and guidance for evaluation of generic implications...”

Action 5: Improve Ability to Correct Problems Early Before They Become Significant Issues

- DAMP Item I.5.1: “Perform a focused self-assessment of the results of Integrated Performance Assessment Trending to provide feedback on quality and to identify site-wide trends.”
- DAMP Item I.5.4: “Develop guidance and implement a CAP focus day to identify and eliminate lower tier CAP open items.”

Action 6: Focus on Improving Quality of Closure Documentation

- DAMP Item I.6.1: “Establish the Corrective Action Closure Board (CACB) as having review authority for apparent cause evaluations...”
- DAMP Item I.6.2: “Provide feedback on CACB determinations to CR analysts, CARB, and managers.”

Action 7: Improve Oversight of the Corrective Action Program

- Commitment 2.c/DAMP Item I.7.1: “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.”
- DAMP Item I.7.2: “Focus CARB review on rigor of cause analysis and effective cause/action resolution...”
- DAMP Item I.7.3: “Qualify additional managers in FENOC CARB JFG to improve ability to routinely establish quorums and hold CARB meetings as scheduled.”
- DAMP Item I.7.4: “Improve the CARB/CACB feedback process to ensure lessons learned are getting to site personnel to promote continuous improvement in the CAP area.”
- DAMP Item I.7.6: “Qualify additional managers in root cause to enable meeting quorum requirements.”

Action 8: PII Phase 1 Carry Over Activities

- DAMP Item I.8.1: “Fully implement the Station OE coordinator and Section OE coordinator role at Perry, as established in NOP-LP-2100, by ensuring the JFG’s are completed for all sections.”
- DAMP Item I.8.3: “Communication will be provided to PIU/Analysts with the formality determined by the SAP conversion change management plan to understand and apply coding.”
- DAMP Item I.8.4: “A method to improve the timeliness of effectiveness reviews will be established and implemented.”

Validated/Closed Perry Phase 1 DAMP Action Items

- DAMP Item D.9.2: “Develop a method to assign clear, single point ownership of root cause CRs, from CR investigation through CA implementation/effectiveness review completion for each root cause CR. (04-02468-69)”
- DAMP Item D1.6: “Perform an external assessment of Corrective Action Program (CAP). (04-02468-46)”
- DAMP Item D11.1: “A two step screening process is being implemented to improve timeliness of issue entry into CAP and more accurate prioritization. (04-02468-66)”