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Docket Number 50-346
License Number NPF-3
Serial Number 1-1455

March 14, 2006

Mr. James L. Caldwell, Administrator
United States Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Subject: Submittal of Independent Assessment Plan for the Davis-Besse Nuclear Power Station Operations Performance – Year 2006

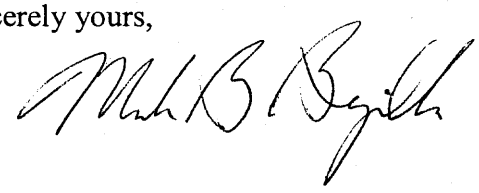
Dear Mr. Caldwell:

The purpose of this letter is to submit the assessment plan and related information for the year 2006 independent assessment of the Davis-Besse Nuclear Power Station (DBNPS) Operations Performance. 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," (letter DBNPS Log Number 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 Operations Performance Assessment Plan, including the identification and qualifications of the assessors. This Assessment is scheduled to commence on June 12, 2006, with the onsite 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 and the final assessment report and action plans, if required, will be submitted to the NRC within 45 days of 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,



LJS

Attachments

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 the 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 at (419) 321-8585 at the DBNPS with any questions regarding this document or associated regulatory commitments.

COMMITMENTS	DUE DATE
None.	N/A

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Attachment 2

Independent Operations Performance Assessment Plan

(5 pages to follow)

NUMBER:
COIA-OPS-2006

ASSESSMENT AREA:
Operations Performance

PURPOSE:

The purpose of this assessment is to provide an independent and comprehensive assessment of Operations Performance 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 that require corrective actions with action plans, and observations for other improvement opportunities. The assessment will also be used to assess the rigor, criticality, and overall quality of available Davis-Besse internal self-assessment activities in this performance area. The final assessment report will provide a conclusion of the effectiveness of the assessed areas, using the rating categories contained in Business Practice DBBP-VP-0009. In addition, the assessment will compare this year's Operations Performance with that observed during the 2005 assessment.

SCOPE:

The Independent Assessment Team will evaluate the following Operations activities occurring during the assessment period using current industry standards and applicable Davis-Besse procedures:

- Shift turnover;
- Control manipulations;
- Communications, including management's expectations in accordance with the Conduct of Operations Procedure;
- Interdepartmental interfaces;
- Procedural use;
- Operation's Procedure revision backlog;
- Awareness of plant and equipment status and workarounds;
- Pre-job/activity briefings;
- Non-shift Operation's management interface and oversight;
- On shift personnel manning and scheduling, including implementation of the Davis-Besse Nuclear Power Station Operations Long Range Staffing Plan, dated October 2005;
- Shift management command and control;
- Shift management's evaluation, prioritization, and disposition of maintenance activities and emergent issues;
- Operation's behaviors in the areas of questioning attitude and safety.
- Shift handling of off-normal operations.
- Observation of operator simulator training to compare crew performance, demeanor, and communication skills with actual control room operations.

SCOPE (cont.):

The Assessment Team will review selected Condition Reports related to Operations Section performance and independently assess the corrective actions taken.

The Assessment Team will also review the Condition Reports initiated to address the Areas in Need of Attention that were identified during the June 2005 Operations Performance Assessment and the final actions taken to address COIA-OPS-2004-(AFI-06)-CR-04-05920, identified during the 2004 Operations Performance Assessment.

The Assessment Team will review Davis-Besse's implementation of reactivity management during plant evolutions.

The Assessment Team will also evaluate the effectiveness of the Davis-Besse Nuclear Power Station's self-assessment activities associated with Operations Performance as follows:

a. Review the results of Davis-Besse Quarterly Quality Assessments that evaluated Operations Performance. 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 both onsite and offsite safety committee activities), and evaluations conducted of Operations Performance. Evaluate the significance of a sample of other self-assessment findings to determine the effectiveness of the self-assessment effort.
c. Determine if the Davis-Besse Operations staff is aggressive in correcting self-assessment findings and determine whether the corrective actions are adequate, timely, properly prioritized, and that effectiveness reviews are ensuring the desired results.

INDEPENDENT ASSESSMENT TEAM:

- Larry E. Briggs, Independent Consultant to Silver Fox Synergies, LLC, Team Leader
- Paul H. Bissett, Independent Consultant to Silver Fox Synergies, LLC
- Eric Olson, Industry Peer, Pilgrim Station – Participation during the week of June 12
- Dana White, Industry Peer, Watts Bar - Participation during the week of June 12

Biographies attached.

SCHEDULE:

- February 20 through March 14, 2006: Develop, review and submit assessment plan to NRC.
- May 12, 2006: Send selected documentation to team members to begin off-site preparations.
- June 11, 2005: Assessment Team will assemble near the plant for final assessment preparations.
- June 12 through June 23, 2006: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- The Assessment Team will provide a draft assessment report to and conduct a Final Debrief with Davis-Besse within 14 days (July 7) after the completion of the assessment execution week(s). The Final Debrief will conclude the assessment.
- The final assessment report will be provided to Davis-Besse within seven (7) days (July 14) following completion of the Final Debrief.
- The final Davis-Besse assessment report and action plans (if required by findings) will be submitted to the NRC by Davis-Besse within 45 days (August 23) of the completion of the assessment.

ASSESSMENT METHODS:

The independent assessment team will use the listed references as guidance to evaluate performance of the Operations department. The assessment methodology will include, but is not limited to the following:

1. Observe Control Room, Non-Licensed and Operations Management personnel in the performance of their assignments. Assessment team member shift assignments will overlap shift turnovers to compare consistency of crew operations.
    - Observe portions of at least three (3) day shifts, two (2) backshifts, and two (2) weekend shifts.
    - Observe portions of at least two (2) shifts of non-licensed activities.

2. Interview selected Control Room, Non-Licensed, and Operations Management personnel.
    - Minimum of five (5) licensed, five (5) non-licensed, and two (2) management.

3. Review selected Condition Reports (CR) and corrective actions to evaluate safety perspective, appropriate cause determination, and corrective action effectiveness. An index of Operations-related CRs will be provided for review during the off-site preparation weeks.
    - Minimum of five (5) Condition Reports.

4. Review Corrective Actions initiated to address the Areas in Need of Attention that were identified during the June 2005 Operations Assessment to evaluate the scope and effectiveness of the corrective actions implemented. Assess the actions taken to address COIA-OPS-2004-(AFI-06)-CR-04-05920, identified during the 2004 Operations Performance Assessment.

ASSESSMENT METHODS (cont.):

5. Observation of simulator training during routine and abnormal operating conditions using NUREG-1021 as guidance and as a comparison with actual Control Room observations. The team will observe and evaluate licensed and non-licensed operator continuing training classroom instruction, including resolution of feedback concerning student comments.

6. Review Davis-Besse's Operations' department implementation of reactivity management during plant evolutions.

REFERENCES:

- DB-OP-00000, "Conduct of Operations"
- DB-OP-00004, "Operator Aids Control"
- DB-OP-00006, "Night Orders and Standing Order Log"
- DB-OP-00016, "Temporary Configuration Control"
- DB-OP-00018, "Inoperable Equipment Tracking Log"
- DB-OP-00200, "Shift Engineer"
- DB-OP-01002, "Component Operation and Verification"
- DB-OP-01003, "Operations Procedure Use Instructions"
- DB-OP-01200, "Reactor Coolant Leakage Management"
- NOP-WM-0001, "Work Management Process"
- NG-DB-00018, "Operability Determinations"
- NOP-WM-2001, "Work Management Scheduling Process"
- NOP-LP-2001, "Condition Report Process"
- NOP-OP-1002, "Conduct of Operations"
- NOP-OP-1004, "Reactivity Management"
- NOPL-OP-01002, "Reactivity Management"
- GP-03, "Conduct of Pre-job Briefs and Post-job Reviews"
- Work Process Guideline (WPG) – 2, "Operation's Equipment Issues"
- NRC Inspection Procedure (IP) 71715, "Sustained Control Room and Plant Observation"
- NRC IP 71707, "Plant Operations"
- NRC IP 93802, "Operational Safety Team Inspection (OSTI)"
- NRC IP 93806, "Operations Readiness Assessment Team Inspections"
- DBNPS Operations Long Range Staffing Plan, October 2005
- An index of Condition Reports, sorted for Operations Department involvement, July 1, 2005 through June 1, 2006;
- The "Work Week Schedule" for the on-site assessment weeks
- The licensed operator training schedule for the on-site assessment weeks
- Last three Quality Assurance quarterly assessments
- Applicable recent internal Operations self-assessments
- Applicable Company Nuclear Review Board minutes from last three CNRB intervals

ASSESSMENT PLAN APPROVALS:

Prepared by: Larry F. Briggs Date: 3/9/2006
Larry F. Briggs, Assessment Team Lead

Approved by: Lori J. Strauss Date: 3/9/06
Lori J. Strauss, Project Manager

Approved by: Jeannie M. Rinckel Date: 3-10-06
Jeannie M. Rinckel, Executive Sponsor

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Attachment 3

Independent Operations Performance Assessment Plan
Assessors and Qualifications

(5 pages to follow)

Larry E. Briggs
Independent Consultant
Silver Fox Synergies, LLC

- 2005 - *Silver Fox Synergies, LLC*; Team Lead, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order.

- 2004 - *Silver Fox Synergies, LLC*; Team Lead, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order. A similar Operations performance assessment was conducted at the Perry Nuclear Power Plant.

- 2001 - *Onsite Inc.*; Senior Consultant - Developed NRC written examination for the Oyster Creek Facility (May 2002 examination).

- 1977 - 2001: *U. S. Nuclear Regulatory Commission (NRC)*; Held various positions with the NRC. Duties included: Senior Operations Engineer (Chief License Examiner and Senior Inspector) - Certified Chief Examiner on General Electric (GE), Westinghouse, and Combustion Engineering plants. Responsible for review, oversight, and administration of licensed operator examinations. Scheduled and made personnel assignments for Region I licensed operator examinations and re-qualification inspections. Responsible for leading team inspections as assigned, such as maintenance rule and for cause re-qualification inspections. Also led numerous NRC routine operator licensing examination teams and re-qualification inspections. Participated in nuclear event response both in Region 1 and at the facility.

- NRC Senior Resident Inspector - Responsible for NRC inspection program at assigned facility and maintained constant interface with utility and NRC concerning plant activities and status; Senior Engineer - Responsible for oversight of NRC pre-operational testing inspection program for Region I facilities; Project Engineer - Responsible for general inspection of assigned NRC Region I facilities and coordinated NRC inspection activities at assigned facilities.

- 1972 - 1977: *Burns and Roe Inc*; Senior Startup Engineer - Responsible for development, implementation, and coordination of pre-operational test and startup procedures for assigned systems at Three Mile Island (TMI) Units 1 and 2. Also, provided on-site engineering resolution to Unit 2 problem reports during construction.

- 1960 - 1972: *U. S. Navy*; Leading CPO (USS Whale SSN 638) for Reactor Control Division. Leading In-hull instructor/Reactor Control Division Officer on D1G Prototype. Engineering Office of the Watch (EOOW) qualified on D1G Prototype. Qualified on S3G Prototype, S2Wa, and S5W Navy power plants.

Paul Bissett
Independent Consultant
Silver Fox Synergies, LLC

- 2005 - *Silver Fox Synergies, LLC*; Team Member, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order.
- 2004 - *Silver Fox Synergies, LLC*; Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order. A similar Operations performance assessment was conducted at the Perry Nuclear Power Plant.
- 2004 - *Performance, Safety & Health Associates, Inc.;* Independent Consultant – Assisted in the conduct of Licensed Operator audit examinations at the St. Lucie Nuclear Power Plant.
- 1989-2003: *U. S. Nuclear Regulatory Commission (NRC)*; Senior Operations Engineer (Chief License Examiner/Inspector) - Certified Chief Examiner on Babcock and Wilcox (1990), Westinghouse (1988) and General Electric (1999) facilities. Effectively led and conducted licensing examinations, and requalification examinations / inspections at Region I facilities.

  Assisted in the administration of operator licensing examinations in Region II (Surry) and Region III (Davis-Besse).

  Responsible for leading team inspections, including, but not limited to, operator licensing requalification, maintenance rule, problem identification and resolution, Event-V, PRA, Emergency Operating Procedure (EOPs) and operational startup inspections.

  Participated in numerous Region I plant restart inspections (TMI-1, IP-2, Salem 1/2, etc.), primarily focusing on operational safety assessments.
- 1982-1989: *U. S. Nuclear Regulatory Commission (NRC)*; Responsible for the conduct of reactor operations inspections, including the areas of maintenance, surveillance and calibration, and in-service testing of pumps and valves, including the review and approval of a licensee's 10 year In-service Test program submittal. Responsible for the review of licensee QA plan submittals and subsequent inspection of licensee QA/QC programs.
- 1977-1982: *U. S. Nuclear Regulatory Commission (NRC);* Responsible for the accountability and security of special nuclear materials at fuel fabricating facilities, including the decommissioning of one major nuclear facility, utilizing non-destructive assay techniques.
- 1970-1976: *U. S. Navy*; Four year assignment on the USS California (CGN-36) included the participation in the construction and testing of the engineering plant, nuclear core installation, pre-critical testing, initial criticality, power range testing and sea trials. As the Leading Machinery Watch (LMW), supervised aft engine room mechanical work activities. Administered preventive maintenance program.

Industry Peer Reviewer

Eric Olson
Operations Manager
Pilgrim Station (Entergy)

- 1988 – Present: *Entergy, Pilgrim Nuclear Power Station:*
  - November 2002 – present: Operations Manager.
  - April 2000 – November 2002: Assistant Operations Manager – Shift. Supervised the Station Shift Managers.
  - 1997 – 1999: Shift Manager on shift.
  - 1996 – 1997: Control Room Supervisor on shift, provided direction to plant operators in response to normal, abnormal and emergency operations. Acted to ensure compliance with licensing requirements and ensure the safe operation of the unit or equipment to protect the health and safety of the public and the environment.
  - 1995: Work Week Manager in the Work Control Department. Responsible for directing and executing all the scheduled work activities for the week, focusing upon coordination and schedule adherence. Served as the single point of contact, and managed inter-group coordination issues within assigned work weeks. Assessed and evaluated work scope changes.
  - June – December 1994: Acting Assistant Maintenance Manager in the Plant Department. Assisted the Maintenance Manager in the planning, scheduling and performance of plant maintenance. Provided oversight, guidance, and approval for administrative functions, such as staffing, budgeting, procedures, internal and external reports, documentation, and cost control.
  - January – June 1994: Compliance Supervisor. Supervised the daily activities of four compliance engineers charged with providing regulatory oversight and program support for activities associated with NRC regulations and the NRC inspection program.
  - April 1989 – January 1994: Senior Nuclear Training Specialist in Operations Training Division. Responsible for the design, development and implementation of training programs for Plant Operations personnel using a Systematic Approach to Training methodology and meeting the requirements of 10CFR Part 55. Performed requalification instruction in the classroom and simulator for Licensed Reactor and Senior Reactor Operators. Evaluated licensed operators in accordance with NUREG-1021. Provided Initial Licensed Operator Hot License training in the classroom and simulator.
  - April 1988 – April 1989: Certified Nuclear Training Specialist, Technical Section of the Nuclear Training Department. Responsible for design, development, and implementation of training programs for Electrical and Mechanical Plant Maintenance personnel. Designed, developed and implemented training programs, utilizing a Systematic Approach to Training. Prepared for, instructed, and documented traditional classroom and laboratory training sessions in accordance with established station procedures and federal requirements. Designed and built mockups and training aids, as necessary, for effective instruction in the classroom and laboratory settings.

- May 1986 – March 1988: *Butler Service Group:* Staff augmentation assignment at Palo Verde Nuclear Generating Station as a certified Mechanical Maintenance Instructor. Designed, developed and implemented training programs for Plant Maintenance or Technical Support personnel, utilizing a Systematic Approach to the Training process. Prepared for, instructed, and documented traditional classroom and laboratory training sessions.

- July 1984 – May 1986: *Advanced Science & Technology Associated, Inc.:* Staff augmentation assignment at San Onofre Nuclear Generating Station as a Refueling Coordinator. Coordinated and supervised refueling activities, including the activities necessary to disassemble/reassemble the reactor vessel, determine and reconstitute failed fuel bundles, and perform related in-service inspections.

- May 1982 - July 1984: *United States Navy, USS William H. Bates (SSN 680):* Supervised operation and casualty control as the Engineering Watch Supervisor and Engineering Duty Petty Officer.

- September 1979 - May 1982: *United States Navy, Navy Nuclear Power Training Unit:* Selected as a Staff Instructor following completion of the nuclear prototype training program. Qualified as an Engineering Watch Supervisor.

Dana Jones White
Operations Manager
Watts Bar Nuclear Plant

- June 2005 to present: *Tennessee Valley Authority, Watts Bar Nuclear Plant;* Operations Manager – Responsible for managing plant operational and fire operations activities, in accordance with regulations and plant operating procedures. Participate in site emergency response organization as a qualified Emergency Director and act as Chairman of the Plant Operations Review Committee.

- April 2005 - June 2005: *Tennessee Valley Authority,* TVAN Corporate Operations Manager - Facilitated fleet initiatives between TVAN sites. Member of Nuclear Safety Review Board Operations Subcommittee

- 1989 – 2005: *Southern Nuclear Operating Company, Farley Nuclear Plant:*

  - 2004 – 2005: INPO Operational Focus Evaluator (Loanee) - Evaluated plants in the areas of operational safety, operational decision making, operational alignment and operations fundamentals

  - 2002 – 2004: Operations Shift Manager - Responsible for safe and efficient operation of the plant, performance management of crew personnel, and identifying and providing recommendations for Operations crew training needs. Ensured compliance with Technical Specifications and plant procedures. Established priorities and coordinated shift activities.

  - 2000 – 2002: Operations Support Superintendent - Supervised off-shift Operations Support staff, managed procedure revisions and reviews, managed the Operations department budget, and coordinated corrective action program and self-assessments.

  - 1999 – 2000: Operations Shift Supervisor - Supervised Plant Operators and Shift Foremen; directed unit operation during startup, power operation and shutdown; and approved removal of equipment and systems from service for maintenance and/or testing.

  - 1998 – 1999: Millenium Project Site Coordinator - Coordinated identification, testing, and needed upgrades or replacement of vulnerable equipment; coordinated development of site contingency plans; and managed the site budget for the project.

  - 1993 – 1998: Operations Shift Foremen/Shift Technical Advisor - Supervised non-licensed operators, prepared tag order clearances and authorized work release, and administered the Surveillance and Fire Protection Programs

  - 1989 – 1993: Engineer - Provided Maintenance and Operations support, coordinated steam generator secondary side services during plant outages, and prepared licensee event reports and responses to regulatory documents