

May 10, 2006

Mr. L. William Pearce
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 - HUMAN PERFORMANCE ACTION
ITEM IMPLEMENTATION REVIEW

Dear Mr. Pearce:

On June 12, 2006, the NRC will begin a review of your actions to address issues related to human performance as part of our September 28, 2005, Confirmatory Action Letter followup inspection activities. In particular, this inspection will focus on determining whether your Commitments associated with the human performance program that were identified in your August 8 and 17, 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 human performance, were adequately implemented. A more detailed review of the overall effectiveness of the actions you implemented toward realizing improvements in human performance 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 May 19, 2006.

If there are any questions about the material requested, or the inspection in general, please call Bob Hagar, who is the team leader for this inspection, at (843) 383-4571.

L. Pearce

-2-

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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 - Human Performance Action Item Implementation 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
G. Halnon, Director, Performance Improvement
J. Shaw, Director, Engineering Department
D. Jenkins, Attorney, FirstEnergy
Public Utilities Commission of Ohio
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Requested Information to Support

CAL Followup Inspection - Human Performance Action Item Implementation 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 closure documentation, original and revised procedures, training plans and training attendance records, meeting schedules and minutes, and qualification records. Documentation shall include, at a minimum, the specific documents requested below.

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 five action areas in PYBP-PII-002, “Performance Improvement Initiative Detailed Action and Monitoring Plan,” Revision 8 and the final revision of the Perry Phase 1 DAMP.

1 Action 1: Set Performance Expectations

0.1 DAMP Item 1.1.1: “Develop and implement a Human Performance policy (NOPL-LP-2008) that aligns with the INPO Excellence in Human Performance publication, dated September 1997.”

Specifically:

0.1.1 Human Performance Policy NOPL-LP-2008.

0.1.2 INPO Excellence in Human Performance publication, dated September 1997.

0.1.3 Documentation regarding the implementation, dissemination, and/or distribution of NOPL-LP-2008.

0.1.4 A site directory.

0.2 DAMP Item 1.2.1: “Revise the Human Performance Program business practice (NOBP-LP-2601) to expand upon roles and responsibilities of key personnel.”

Specifically:

0.2.1 The current revision of NOBP-LP-2601.

0.2.2 The previous revision of NOBP-LP-2601.

- 0.3 DAMP Item 1.2.3: “Establish a self-assessment and benchmarking schedule. This action should include industry meetings and non-FENOC plants for benchmarking.”

Specifically:

- 0.3.1 Current and previous revisions of the self-assessment and benchmarking schedule, for the period from 1/30/06 to 6/01/06.
- 0.3.2 Subject self-assessments reports completed between 1/30/06 and 6/01/06.
- 0.3.3 Reports of benchmarking activities completed between 1/30/06 and 6/01/06.
- 0.3.4 Reports that describe actions that were implemented as a result of self-assessments and benchmarking activities completed between 1/30/06 and 6/01/06.

- 0.4 DAMP Item 1.3.7: “Provide supplemental skill training for key supporting groups based on identified needs within the human performance program.”

Specifically:

- 0.4.1 Materials and lessons plans used to provide supplemental skill training to key supporting groups.
- 0.4.2 Supplemental skill training attendance records.
- 0.4.3 Personnel rosters of the key supporting groups.
- 0.4.4 Qualification requirements for personnel in the key supporting groups.

1 Action 2: Strengthen Line Ownership, Alignment, and Integration

- 1.1 DAMP Item 2.1.1: “Expand the Site Advocate position to include responsibilities for stewardship of the program’s technical content. Establish stronger line organizational presence and reporting of the Site Advocate.”

Specifically:

- 1.1.1 Current Site Advocate position description.
- 1.1.2 Previous Site Advocate position description.
- 1.1.3 Records which describe the results produced by the Site Advocate position.

- 1.2 DAMP Item 2.1.2: “Establish the Human Performance Team by performing the following actions: 1) Assign a management sponsor to the committee, 2) Assign group representatives and alternates to participate in the Human Performance Leadership Team, 3) Conduct routine meetings (nominally, monthly meetings), and 4) Design and implement interventions to improve performance as needed.”

Specifically:

- 1.2.1 The document(s) that describes the responsibilities of the Human Performance Leadership Team.
 - 1.2.2 Results produced by the method used to monitor the effectiveness of the Human Performance Leadership Team.
 - 1.2.3 Any reports or other documents produced by the Human Performance Leadership Team.
- 1.3 DAMP Item 2.1.4: “Staff a temporary position responsible for coordinating HU [Human Performance] observations.”

Specifically:

- 1.3.1 A description of the method(s) used to gather and coordinate HU observations.
 - 1.3.2 A list of the HU observations gathered and subsequently coordinated by this position.
 - 1.3.3 A list and brief description of the HU program improvements that were implemented as a result of the observations coordinated by this position.
- 1.4 DAMP Item 2.1.5: “Allocate [Management Alignment and Ownership Meeting] meeting time to Human Performance discussion on topics such as improvement initiative status, utilization of human performance on daily activities involving risk, discussion of department/site human performance (metrics).”

Specifically:

- 1.4.1 MAOM meeting reports since 1/30/06.
- 1.5 DAMP Item 2.2.1: “Refine metrics for monitoring station and section human performance (beyond site clock reset). Consider tracking error rates to better monitor station and section human performance. Monitor performance and report results to the sections in routine meetings.”

Specifically:

- 1.5.1 A description of changes made in the metrics for monitoring station and section human performance.
 - 1.5.2 A description of the trends in those metrics from 1/30/06.
- 2 Action 3: Improve Line Accountability For Results
- 2.1 DAMP Item 3.1.2: “Revise manager and supervisor performance management plans (PMPs) to assure line ownership and implementation of the human performance program.”

Specifically:

2.1.1 For the manager and supervisor performance management plans affected by DAMP Item 3.1.2, the plans as they existed on 12/30/05, and the plans as they presently exist.

3 Action 4: Address Procedure Use and Adherence

3.1 Commitment 3.a: "Roles and responsibilities of the Site Leadership Team in implementing the human performance program will be defined and communicated," and DAMP Item 1.3.3: "Define and communicate the roles and responsibilities of Perry managers, directors, and the site vice president in implementing the human performance program."

Specifically:

3.1.1 The document(s) in which the roles and responsibilities of the Site Leadership Team in implementing the human performance program are defined.

3.1.2 Records that identify how and to whom the roles and responsibilities of the Site Leadership Team in implementing the human performance program were communicated.

3.2 Commitment 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." and DAMP Item 2.3.1: "Conduct monthly (nominal) meetings of the Senior Training Advisory Committee (STAC) with a strong focus on Human Performance (HU).

Specifically:

3.2.1 Meeting minutes for the Site Training Advisory Committee and department/section Training Review Committee meetings held since the third quarter of 2005.

3.3 Commitment 3.c: "The purpose and key activities of the Human Performance Program will be communicated to Perry Nuclear Power Plant (PNPP) personnel;" and DAMP Item 1.3.1: "Develop and implement a communications plan to communicate the purpose and key activities of the human performance initiative."

Specifically:

3.3.1 Documents used to communicate the purpose and key activities of the Human Performance Program to PNPP personnel.

3.3.2 Any evidence, records, or artifacts remaining from communicating the purpose and key activities of the Human Performance Program to PNPP personnel.

3.4 Commitment 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;” and DAMP Item 1.3.4, “The training committees shall perform a group-specific needs analysis to determine the scope and content of initial and continuing training needs on the human performance fundamentals error prevention tools;” and DAMP Item 1.3.5, “Present Human Performance Fundamentals as determined by the needs analysis to the appropriate station staff.”

Specifically:

- 3.4.1 A description(s) of the methods used to complete the group-specific needs analyses, and results and records produced during the completed group-specific needs analyses.
 - 3.4.2 The changes that were made in the scope and/or content of affected training programs and/or the materials developed for new training programs as a result of the group-specific needs analyses, and the document-change records that identify both the bases for the changes and the dates on which those changes were implemented.
 - 3.4.3 Descriptions of the error-prevention tools and training provided to plant personnel.
 - 3.4.4 The materials used to provide training on error-prevention tools to plant personnel.
 - 3.4.5 Records that identify when and to whom the error-prevention tools and training were provided.
- 3.5 DAMP Item 1.3.11: “Conduct parallel observations with managers or other supervisors to cross-calibrate each other on effective observation techniques. Managers should conduct parallel observations with each of their direct report supervisors quarterly and through 4th quarter 2005. The intent of this corrective action is to improve supervisors’ abilities to coach workers on expected behaviors - correcting inappropriate behaviors and reinforcing desired behaviors. The parallel observations should reinforce these coaching and observation skills.”

Specifically:

- 3.5.1 Memoranda or other documents which describe and provide guidance for conducting parallel observations.
- 3.5.2 A description of and results produced by the method used to monitor implementation of the parallel observation program.
- 3.5.3 Reports of observations made through parallel observations.
- 3.5.4 Reports that describe actions taken as a result of observations made through parallel observations.

4 Action 5: Confirm Initiative Effectiveness

4.1 DAMP Item 5.1.1: "Perform an interim effectiveness review."

Specifically:

4.1.1 A description of the methods used to complete the interim effectiveness review.

4.1.2 The memoranda or other documents which assigned personnel to and/or directed assigned personnel to complete the interim effectiveness review.

4.1.3 All documents produced by the interim effectiveness review, including meeting minutes, status memoranda, interim reports, and the final report.

4.1.4 Documents that describe plant management's response to the report produced by the interim effectiveness review, including condition reports (CRs) generated as a result of the review, memoranda initiated and distributed as a result of the review, and minutes of management meetings in which the review and/or its results were discussed.

4.2 DAMP Item 5.1.2: "Perform an integrated review of initiative performance indicators in support of developing an initiative closure report."

Specifically:

4.2.1 The procedure used to complete the integrated review.

4.2.2 The report which describes results produced by the integrated review.

4.2.3 Any CRs that were generated as a result of the integrated review.

5 Validated/Closed Perry Phase 1 DAMP Action Items

5.1 DAMP Item B1.10: "Perform a review of the Human Performance Program."

Specifically:

5.1.1 The Human Performance Program Review Package.

5.1.2 If not contained in the Human Performance Program Review Package, a description of the method(s) used to review the Human Performance Program.

5.1.3 Documents which describe plant management's response to the Human Performance Program Review Package, including CRs generated as a result of the review, memoranda initiated and distributed as a result of the review, and minutes of management meetings in which the Human Performance Program review and/or its results were discussed, except those documents which are included in the Human Performance Program Review Package.

- 6.2 DAMP Item B1.10.1: “Evaluate the Human Performance Program Review Package and implement any remedial actions to ensure the program will support safe reliable plant operation.”

Specifically:

- 6.2.1 A description of the method(s) used to review the Human Performance Program Review Package.
- 6.2.2 All documents produced by the review of the Human Performance Program Review Package, including (but not limited to) meeting minutes, status memoranda, interim reports, and the final report.
- 6.2.3 The report that describes results of the review of the Human Performance Program Review Package. Documents which describe plant management’s response to that report, including (but not limited to) CAP items initiated as a result of the review, memoranda initiated and distributed as a result of the review, and minutes of management meetings in which the review and/or its results were discussed.
- 6.3 DAMP Item D10.7: “An improvement plan will be developed and any new actions added to this initiative to regain the value intended for trending and feedback to personnel on expected standards by the Field Observation Program (04-02468-77).”

Specifically:

- 6.3.1 A description of the Field Observation Program.
- 6.3.2 The improvement plan developed to regain the value intended for trending and feedback to personnel on expected standards by the Field Observation Program.
- 6.3.3 Descriptions of new actions added to the initiative to regain the value intended for trending and feedback to personnel on expected standards by the Field Observation Program.

Additional Information

In addition to the specific information requested above, the following information is requested:

- Four (4) copies of the most recent revision of the Performance Improvement Initiative (PII).
- Four (4) copies of the most recent revision of the Detailed Action and Monitoring Plan (DAMP).
- Four (4) copies of site and department level Human Performance Success Clock data from January 2006 to present.
- Plant maintenance and surveillance schedule for the weeks of June 12, 2006, and June 19, 2006.

- A schedule of routine plant activities involving control room operations personnel from 06/13/06 to 06/23/06.
- A schedule of meetings that are planned to be held at the site from 06/13/06 to 06/23/06.
- A schedule of planned preventive and corrective maintenance activities from 06/13/06 to 06/23/06.
- A description of the Key Performance Indicators that measure and indicate Human Performance.
- A summary of the changes that Human Performance improvement initiatives are expected to produce in the Human Performance area.