



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Station  
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April 17, 2006  
PY-CEI/OIE-0668L

Mr. James L. Caldwell  
Regional Administrator, Region III  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352

Perry Nuclear Power Plant  
Docket No. 50-440  
License No. NPF-58

Subject: First Quarter 2006 - Update of Confirmatory Action Letter (CAL) Commitments

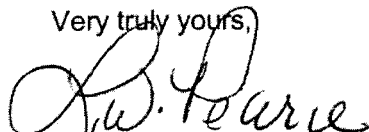
Dear Mr. Caldwell,

In your letter dated September 28, 2005 which transmitted the CAL commitments, you requested FirstEnergy Nuclear Operating Company (FENOC) to provide quarterly updates for any completed commitments. This letter provides the requested update for the first quarter of 2006. FENOC has completed one (1) commitment that was scheduled for completion in the first quarter 2006. The completed commitment is Item Number 3.d in the area of Excellence in Human Performance. The attached table depicts those commitment items completed to date.

As stated in our letter dated January 30, 2006 (PY-CEI/OIE-0662L), we have completed two (2) CAL commitments in the area of Emergency Preparedness during the 4<sup>th</sup> quarter of 2005. Since then, we have conducted two (2) Emergency Response Organization drills in March and April 2006 where the overall drill objectives were satisfactorily met. To maintain sustainability in this area, future drills will be conducted in accordance with our procedure that governs the drill frequency. Also, FENOC has completed the follow-up actions from the NRC IP 95003 inspection in the area of emergency preparedness. Those actions included resolution of issues identified as non-cited violations, unresolved issues, and other key observations identified during the IP 95003 inspection. The completeness of those actions was recently confirmed with no preliminary findings during the NRC CAL Follow-up Inspection in April 2006. FENOC plans to continue to perform self-assessments in the area of emergency preparedness to ensure that the program and organization maintains the health and safety of the public. Therefore, FENOC considers those CAL items and follow-up issues from the NRC IP 95003 for emergency preparedness are complete.

There are no additional commitments contained in this letter. We will continue to update you on our progress on a quarterly basis per your request. If you have any have questions or require additional information, please contact Mr. Jeffrey Lausberg, Manager, Regulatory Compliance at (440) 280-5940.

Very truly yours,



L. William Pearce

Attachment

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

## PNPP Commitments

Attachment  
PY-CEI/OIE-0668L

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	Complete
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	Complete
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	Complete
3.c	The purpose and key activities of the Human Performance Program will be communicated to Perry Nuclear Power Plant (PNPP) personnel.	Fourth 2005	Complete
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	Complete
<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	Complete
4.b	Additional drills will be conducted to demonstrate appropriate Emergency Response Organization response times.	Fourth 2005	Complete