

May 26, 2006

Mr. Dealis W. Gwyn, Licensing Manager  
Duke Cogema Stone & Webster  
P. O. Box 31847  
Charlotte, NC 28231-1847

SUBJECT: REQUEST FOR OFFICE VISIT TO DISCUSS FACILITY-SPECIFIC  
PERFORMANCE INDICATORS

Dear Mr. Gwyn:

As you are aware, the Commission has requested the staff to explore the feasibility of developing facility-specific performance indicators (PIs) for fuel facilities. In order to initiate this effort, in early February 2006, I sent letters to you and operators of other large fuel facilities, in which I requested responses to the following two questions:

1. What unique aspects of your facility do you believe should be taken into consideration as we propose facility-specific PIs?
2. What suggestions do you have for potential PIs and/or PI thresholds that might be applied specifically to your facility?

Based on our assessment of the responses received, the U.S. Nuclear Regulatory Commission (NRC) has determined that due to the diverse nature of fuel facilities, it would be most effective and efficient for NRC staff to discuss potential facility-specific PIs and PI thresholds on an individual licensee basis. As such, I propose that Mr. Yawar Faraz and another member of my technical staff conduct either a conference call or visit to your office, not to exceed one day, to discuss with you any facility-specific information that might assist the NRC in determining the feasibility of developing facility-specific PIs that could be of use in NRC's licensing and oversight process.

Enclosed please find a list of potential PIs that the NRC has drafted. The NRC would appreciate receiving, during the conference call or office visit, your constructive feedback on these potential PIs. In particular, at the time of the conference call or office visit, the NRC requests that you have available several examples of facility-specific process information which, when applied to the attached PIs, could result in the development of facility-specific PIs and PI thresholds.

D. Gwyn

-2-

We would like to conduct the conference call or office visit during the months of July, August or September 2006. Please inform me through the NRC's project manager for your facility, Mr. David Tiktinsky, within one week of your receipt of this letter, your preference between a conference call or an office visit including your availability to do so.

If you have any questions concerning this letter, please contact Mr. Yawar Faraz, of my staff, at (301) 415-8113.

Sincerely,

***/RA/***

Melanie A. Galloway, Chief  
Technical Support Section  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

Docket: 70-3098

Enclosure: List of Possible PIs

D. Gwyn

-2-

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Enclosure: List of Possible Pls

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<b>OFC</b>	TSS		TSS		TSS			
<b>NAME</b>	YFaraz		RWray		MGalloway			
<b>DATE</b>	5/ 26 /06		5/ 26 /06		5/ 26 /06			

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List of Possible Performance Indicators (PIs)

**Safety Analysis:**

1. Number of new credible accident sequences identified following and associated with a reportable event
2. Number of a new credible accident sequences identified by the licensee as a result of self assessment
3. Number of failures of hardware items relied on for safety (IROFS)/safety systems
4. Number of failures of administrative IROFS or actions (procedural steps) associated with safety systems
5. Number of times IROFS were determined to be unavailable or unreliable outside the bounds of the integrated safety analysis (ISA) assumptions and considerations (excludes preventive maintenance)
6. Number of hours IROFS were determined to be unavailable outside the bounds of the ISA assumptions and considerations (excludes preventive maintenance)

**Configuration Management:**

7. Number of events or U.S. Nuclear Regulatory Commission (NRC) findings that involved as-found/unanalyzed plant conditions determined to be outside the bounds of the application and ISA
8. Number of instances licensee self assessments identified as-found/unanalyzed plant conditions determined to be outside the bounds of the application and ISA

**Radiation Protection:**

9. Number of workers who received doses above the administrative limits
10. Ratios of average effluent activities or offsite doses over allowed limits

**Training:**

11. Number of employees that need to be trained on hardware and administrative IROFS
12. Number of employees whose training on IROFS was out of date
13. Number of errors due to deficiencies in training

**Violations:**

14. Number of Level II violations
15. Number of Level III violations

**Events and Emergency Preparedness:**

16. Number of reportable events

Enclosure

List of Possible Performance Indicators (PIs) Cont'd

17. Number of events involving spills, releases or inadvertent diversion of material that could potentially result in a high-consequence or intermediate-consequence accidents
18. Number of findings during emergency drills and exercises (Emergency Plan requirements/considerations/assumptions not met)
19. Number of events at other plants that undergo review/analysis

**Independent External Review:**

20. Number of independent external reviews conducted
21. Number of external review findings not previously identified by internal review