

September 14, 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
SUPPLEMENTAL IP 95002 ISSUES EFFECTIVENESS REVIEW

Dear Mr. Pearce:

On October 23, 2006, the NRC will begin a review of your supplemental actions to address issues related to our previous IP 95002 inspection findings and observations at your Perry Nuclear Power Plant as part of our September 28, 2005, Confirmatory Action Letter followup inspection activities.

In particular, the inspection has the objective of determining whether your supplemental corrective actions to address maintenance procedure adequacy issues have been effective.

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 October 11, 2006.

If there are any questions about the material requested, or the inspection in general, please call Eric Duncan at (630) 829-9628 or John Ellegood at (269) 764-8971.

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 Document Room or from the Publicly Available Records (PARS) component of

L. Pearce

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NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

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
- Supplemental IP 95002 Issues Action Item Effectiveness 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
Ohio State Liaison Officer
R. Owen, Ohio Department of Health

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Requested Information to Support

CAL Followup Inspection - Supplemental IP 95002 Issues Effectiveness Review

Maintenance Procedure Adequacy - Background

By letter dated September 28, 2005, the NRC issued a Confirmatory Action Letter (CAL) to Perry which acknowledged the NRC's understanding of FENOC's commitment to make sustained improvement to address issues in the areas of Human Performance, Corrective Action Program Implementation, Emergency Preparedness, and Inspection Procedure 95002 Issues.

On March 14, 2006, the NRC completed a CAL Followup Inspection in the IP 95002 Issues area that reviewed selected Commitments and Action Items described in the Perry Phase 2 PII Detailed Action and Monitoring Plan (DAMP). The specific purposes of this inspection were to: (1) Determine whether licensee corrective actions to address maintenance procedure adequacy issues were adequate, (2) Determine whether licensee corrective actions to address emergency service water (ESW) pump coupling assembly concerns were adequate, and (3) Determine whether licensee corrective actions to address training issues were adequate.

Overall, the NRC concluded that the licensee satisfactorily implemented the Commitments and Action Items that were reviewed. Notwithstanding this overall conclusion, the NRC also identified some cases where the licensee's implementation of these actions was weak, which potentially impacted the overall ability to effectively resolve these issues. A complete discussion of the findings and other observations from this inspection is documented in NRC Inspection Report 50-440/2006007.

By letter dated May 9, 2006, FENOC responded to the IP 95002 Issues Action Item Implementation inspection. In this letter FENOC documented that corrective actions to address the technical and administrative deficiencies identified during the review of revised maintenance procedures would include a supplemental review effort for all 118 maintenance procedures that were within the scope of the initial review effort.

On August 15, 2006, the NRC completed a CAL Followup Inspection in the IP 95002 Issues area that reviewed the overall effectiveness of the licensee's actions to address the IP 95002 Issues area. In the area of Maintenance Procedure Adequacy, no findings of significance were identified and the inspectors concluded that improvements in this area continued to be realized. However, the inspectors determined that, overall, the licensee's effectiveness in addressing this area was indeterminate based upon the following issues:

- At the end of the inspection, of the 118 procedures that were within the scope of a supplemental maintenance procedure review effort, only 1 had been reviewed and approved. As a result, a sufficient number of procedures were not available for the inspectors to review to determine whether corrective actions to address this area had been effective.
- The inspectors identified two maintenance procedure revision process vulnerabilities that potentially challenged the ability to sustain improvement efforts in this area. The first maintenance procedure revision process vulnerability involved the performance of procedures in the field that had been previously identified as deficient. A second

maintenance procedure process vulnerability concerned the exceptions to procedure guidance and a management expectation that procedures steps be accomplished in the order prescribed by the procedure.

The purpose of this Supplemental CAL Followup inspection is to complete a review of the overall effectiveness of the licensee's actions to address the Maintenance Procedure Adequacy aspect of the IP 95002 Issues area and determine whether any additional inspection beyond that prescribed by the ROP baseline inspection program is required.

Maintenance Procedure Adequacy - Documentation Request

To determine the effectiveness of the corrective actions to address the area of Maintenance Procedure Adequacy, the following documents are requested:

- One copy of the listing of the 118 maintenance procedures subject to Commitment Item 1.a. of the Perry CAL.
- One copy of a listing of the 118 maintenance procedures that have been re-revised to date as part of the supplemental procedure review effort and a completion schedule for the remaining procedures.
- One copy of the maintenance activity schedule for the time frame of the inspection, October 23 - November 3, 2006, specifically highlighting activities that will be conducted using the 118 re-revised maintenance procedures.
- One copy of a listing of maintenance activities that were accomplished using the 118 revised maintenance procedures after these procedure had been re-revised.
- One copy of condition reports (CRs) that identify procedure adequacy issues that occurred and were associated with the 118 maintenance procedures after these procedures had been re-revised.
- One copy of the CRs generated to enter the maintenance procedure revision process vulnerabilities into the corrective action program and corrective action documentation associated with the resolution of the identified issues.