



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Station
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January 19, 2007
PY-CEI/OIE-0690L

Mr. James Caldwell
Nuclear Regulatory Commission
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: Supplemental Information to January 10, 2007, Public Meeting

Dear Mr. Caldwell:

The purpose of this letter is to provide the NRC with supplemental information regarding FirstEnergy Nuclear Operating Company (FENOC) efforts to effectively monitor and sustain station performance at Perry Nuclear Power Plant (PNPP) on an on-going basis.

During the January 10, 2007 public meeting, FENOC discussed continuing use of self-assessments, benchmarking activities, and Key Performance Indicators (KPIs) to identify gaps to excellence and then to use that information to facilitate continuous improvement. These tools are the means FENOC uses to assess and monitor station performance and to verify that continuing sustained improvements are made. When gaps are identified, condition reports are generated and key actions to address those gaps implemented in the Excellence Plan. This approach is consistent with the FENOC philosophy for driving continuous improvement throughout the Fleet.

The monthly Perry Management Performance Review (MPR) activities and periodic Executive Leadership Team (ELT) meetings will continue to be the site and fleet senior management forum to provide oversight of the continuous improvement at PNPP. The initiatives identified in the Perry Excellence Plan will be monitored as a part of the MPR to assure proper accountability and timeliness of implementation. Additionally, effectiveness of implemented actions will be evaluated by the MPR through monitoring of the station's KPIs.

Perry's Company Nuclear Review Board (CNRB) will provide oversight of implementation effectiveness of the Perry Excellence Plan. FENOC recently changed the membership to renew the CNRB with seasoned individuals with recent industry experience. One individual was the chairman of the Performance Overview Panel

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(POP) that provided oversight of the Perry Performance Improvement Initiative (PII) Phase 2. Therefore, this change in the CNRB membership will provide for a critical oversight of those actions being implemented as part of the Perry Excellence Plan and also provide continuity with actions that were taken as part of the Perry PII Phase 2.

In addition to performing the self-assessments and benchmarking activities currently scheduled in the Perry Excellence Plan for key areas (such as in human performance), FENOC will perform an independent assessment in the area of corrective action program. This independent assessment is planned for third quarter 2007 and will be similar to the assessment that was performed at Davis-Besse in 2006. This assessment will focus on Perry's continuous improvement and sustained performance within the corrective action program and evaluate whether improvements made through implementation of the Perry PII Phase 2 continue to be realized. The results of these assessments will be presented to FENOC senior management and critiqued by the Perry CNRB.

When the independent assessment is complete, FENOC will schedule a meeting with the NRC to share the results in fourth quarter 2007.

A regulatory commitment list is provided in an attachment to this letter. If you have any questions or require additional information, please contact Mr. Jeffrey Lausberg – Manager, Regulatory Compliance at (440) 280-5940.

Very truly yours,



L. William Pearce

Attachment: Commitment List

cc: Document Control Desk
NRC Project Manager
NRC Resident Inspector
E. Duncan, NRC

COMMITMENT LIST

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) in this document. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only for information and are not regulatory commitments. Please notify Jeffrey Lausberg - Manager, Regulatory Compliance at (440) 280-5940 of any questions regarding this document or any associated regulatory commitments.

Commitment	Due Date
When the independent assessment is complete, FENOC will schedule a meeting with the NRC to share the results in fourth quarter 2007.	Fourth Quarter 2007